TSD File Inventory Index

Date: Aug. 16, 2006

Initial: CMGenereux

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Facility Identification Number:	OHD 001 926 740

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Note: Transmittal Letter to Be Included with Reports.
Comments:_____

LAND AND CHEMICALS DIVISION

Type of Document: Notice of Violation

Name of Document: Hukill Chemical Corporation (OHD001926740)

	NAMES	DATE
AUTHOR:	DERRICK SAMARANSKI	01/14/2015
APA:	Concurrence - by e-mail	02/05/15
SECTION CHIEF:	J. Morris	2/6/15
BRANCH CHIEF:		2/11/15
DIVISION APA:		
DIVISION DIRECTOR:		
OTHERS: ORC	Nicole Cantello	5 Feb 15
DRA:		
RA:		

RETURN TO:

PHONE:

COMMENTS:

State notified 2/4/15

please also bcc Mary Setnicar

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece,

Mr. Frank Simic
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Mary Costa ☑ Agent ☐ Addressee

B. Received by *(Printed Name)*

C. Date of Delivery 3-5-15

address different from item 1? ☐ Yes
ter delivery address below: ☑ No

3. Service Type
☐ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number
(Transfer from service label) 7009 1680 0000 7677 9609

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

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05 MAR '15
PM 2 L

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USPS
Permit No. G-10

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U.S. EPA
77 W. Jackson Blvd, - LR-8J
Chicago, Illinois 60604
Attn: Gaye Cuerington / DS

RECEIVED
DIVISION FRONT OFFICE
MAR 06 2015
LAND AND CHEMICALS DIVISION
U.S. EPA - REGION 5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 2 0 2015

CERTIFIED MAIL 70091680000076779609
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Mr. Frank Simic
Environmental Health and Safety Manager
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146

Re: Notice of Violation
RCRA Compliance Evaluation Inspection Hukill Chemical Corporation
EPA I.D. No.: OHD001926740

Dear Mr. Simic:

From September 17-20, 2012, representatives of the U.S. Environmental Protection Agency inspected Hukill Chemical Corporation (Hukill) located in Bedford, Ohio. The purpose of the inspection was to evaluate Hukill's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on the information provided by Hukill personnel, review of records, and personal observations made by the inspectors at the time of the investigation and pursuant to Section 3008(a)(2) of RCRA, 42 U.S.C. § 6928(a)(2), EPA has determined that Hukill is in violation of the Subpart AA, BB, and CC requirements and issues this Notice of Violation:

Subpart AA

1. Owners and operators of process vents associated with thin-film evaporation operations managing hazardous wastes with organic concentrations of at least 10 parts per million weight (ppmw) and using closed-vent systems and control devices (condensers) to reduce organic emissions from the process vents electing to use engineering calculations to determine the organic removal efficiency of the control devices (condensers) must demonstrate control unit efficiency of 95 weight percent or greater. *See* 40 CFR §§ 265.1032(b) and (c), 265.1033(b). At the time of the inspection, Hukill failed to demonstrate through engineering calculations that the two condensers associated with the two LUWA units were operated at an efficiency of 95 weight percent or greater. Therefore, Hukill violated the facility organic vapor control device efficiency requirement.

2. Owners and operators of process vents associated with thin-film evaporation operations managing hazardous wastes with organic concentrations of at least 10 ppmw using engineering calculations to demonstrate 95 weight percent efficiency of control units must maintain up-to-date documentation (all identifying information, engineering calculations) of compliance with the process vent standards. *See* 40 CFR § 265.1035(b)(2). At the time of the inspection, Hukill failed to maintain adequate documentation of compliance with process vent standards for the two condensers associated with the two LUWA units. Therefore, Hukill violated the records keeping requirement.

3. Owners and operators of process vents associated with distillation operations managing hazardous wastes with organic concentrations of at least 10 ppmw, using performance tests to determine the organic removal efficiency of the installed control units, must ensure that performance tests conform with requirements of 40 CFR § 265.1034(c). *See* 40 CFR §§ 265.1032(b) and (c), 265.1033(b), 265.1034(c). At the time of the inspection, Hukill failed to demonstrate through performance tests that the condenser associated with the distillation column was operated at an efficiency of 95 weight percent or greater. Therefore, Hukill violated the organic emission control device efficiency requirement.

4. Owners and operators of process vents associated with distillation operations managing hazardous wastes with organic concentrations of at least 10 ppmw must monitor vent flow rates, and concentration level of the organic compounds in the exhaust from the condenser pursuant to 40 CFR § 265.1033(f)(1) and (2)(vi). At the time of the inspection, Hukill failed to monitor vent flow rates, and concentration level of the organic compounds in the exhaust from the condenser associated with the distillation column. Therefore, Hukill violated organic emission process vent monitoring requirement.

5. Owners and operators of process vents associated with distillation operations managing hazardous wastes with organic concentrations of at least 10 ppmw must operate the process vents according to the limits or operating conditions pursuant to 40 CFR § 265.1032. At the time of the inspection, Hukill failed to control organic emissions from the conservation vent on the distillation process tank number 7. Therefore, Hukill violated the process vent organic emissions control requirement.

6. Owners and operators of process vents associated with thin-film evaporation operations managing hazardous wastes with organic concentrations of at least 10 ppmw must monitor process vent flow rates, and concentration levels of the organic compounds in the exhaust from the condenser pursuant to 40 CFR § 265.1033(f)(1) and (2)(vi). At the time of the inspection, Hukill failed to monitor vent flow rates, and concentration levels of the organic compounds in the exhaust from the condensers associated with the two LUWA units. Therefore, Hukill violated the organic vapor control device monitoring requirement.

7. Owners and operators of process vents associated with thin-film evaporation operations managing hazardous wastes with organic concentrations of at least 10 ppmw must provide a

statement as required by 40 CFR § 265.1065(b)(4)(v). *See* 40 CFR § 265.1065(b)(4)(v). At the time of the inspection, Hukill failed to provide a statement as required by 40 CFR 265.1065(b)(4)(v) stating that two condensers associated with the two LUWA units were operated at an efficiency of 95 weight percent or greater. Therefore, Hukill violated the records keeping requirement.

8. Owners and operators of process vents associated with thin-film evaporation operations managing hazardous wastes with organic concentrations of at least 10 ppmw must maintain records of annual inspections of the closed vent systems pursuant to 40 CFR § 265.1035(c)(3). At the time of the inspection, Hukill failed to maintain records of the annual inspections of the two closed-vent systems associated with the two LUWA units during years 2010 and 2011. Therefore, Hukill violated the facility records keeping requirement.

Subpart BB

9. Owners and operators of equipment that contains and contacts hazardous wastes with organic concentrations of at least 10 percent by weight must calibrate the monitoring equipment according to EPA Method 21, pursuant to 40 CFR § 265.1063(b)(4). At the time of the inspection, records indicated that in 2011, Hukill failed to properly calibrate monitoring equipment when conducting monitoring of components subject to Subpart BB monitoring (used single calibration gas). Therefore, Hukill violated the monitoring equipment calibration requirement.

10. Owners and operators of equipment that contains and contacts hazardous wastes with organic concentrations of at least 10 percent by weight must record information required by 40 CFR 265.1064(b). *See* 40 CFR § 265.1064(b)(4). At the time of the inspection, Hukill failed to record the required information for 34 valves and 1 pump subject to subpart BB monitoring requirements. Therefore, Hukill violated the subpart BB record keeping requirement.

Subpart CC

11. Owners and operators of tanks that manage hazardous waste with average volatile organic concentration of 500 ppm must determine maximum organic vapor pressure of the hazardous wastes to be stored in the tanks pursuant to 40 CFR § 265.1084(c). At the time of the inspection, Hukill failed to properly determine maximum organic vapor pressures of wastes stored in the following tanks: 8-11, 13-16, 52, 53, 55, 56, and 60-62. Hukill failed to account for the maximum temperature of the wastes streams which could affect the vapor pressure of the waste streams. Therefore, Hukill violated the subpart CC maximum vapor organic pressure requirement.

12. Owners and operators of tanks that manage hazardous waste with average volatile organic concentration of 500 ppm must maintain records of the annual inspections performed on hazardous waste tank systems storing organic wastes pursuant to 40 CFR § 265.1090(b)(1),

265.1085(c)(4). At the time of the inspection, Hukill failed to maintain complete annual inspection records of its tanks storing organic wastes: 8-11, 13-16, 52, 53, 55, 56, and 60-62 during years 2010-2012. Therefore, Hukill violated the subpart CC records keeping requirement.

13. A permitted facility of hazardous waste accumulating wastes in satellite containers, must date excess hazardous waste accumulated over 55-gallons with an accumulation start date pursuant to 40 CFR § 262.34. At the time of the inspection, Hukill failed to record the date of excess hazardous waste accumulated in the facility's east warehouse with an accumulation start date. Therefore, Hukill violated the generator satellite accumulation dating requirement at 40 CFR § 262.34.

Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements. You should submit your response to Derrick Samaranski, U.S. EPA Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Derrick Samaranski, of my staff, at (312) 886-7812. Legal questions should be directed to Nicole Cantello, Attorney-Advisor, at (312) 886-2870.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosures

cc: Teri Finfrock, Ohio EPA, Teri.Finfrock@epa.ohio.gov

Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

December 22, 2011

Mr. Frank Simcic
EH&S Manager
Hukill Environmental Services
7013 Krick Road
Bedford, OH 44146

RE: HUKILL ENVIRONMENTAL SERVICES, TSD/LQG/TRANSPORTER OHD001926740/02-18-0315, CUYAHOGA COUNTY, NOC

Dear Mr. Simcic:

On December 12 and 19, 2011, I conducted a compliance evaluation inspection at Hukill Environmental Services (HES), located at 7013 Krick Road, Bedford, Ohio. I inspected HES to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). HES was represented by you and Brent Foreman, and the Ohio EPA was represented by me.

This inspection included a facility walk through, review of outbound manifests, waste data sheets, weekly and daily inspection checklists, the daily drum inventory log, the daily bulk solvent inventory sheets, and review of waste tracking. Recently, I reviewed the contingency plan and you submitted a class 1 permit modification to update the list of emergency coordinators. I have enclosed copies of the inspection checklists for your records.

No violations of the hazardous waste rules were noted during this inspection.

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

You can find copies of the rules and other information on the hazardous waste division's web page at http://www.epa.state.oh.us/dhwm. Ohio EPA also has helpful information about pollution prevention at the following web address: http://www.epa.state.oh.us/opp.

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087-1924

330 | 963 1200
330 | 487 0769 (fax)
www.epa.ohio.gov

The former Division of Hazardous Waste Management has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage

Should you have any questions or concerns, please do not hesitate to call me at (330) 963-1162.

Sincerely,

Marlene M. Kinney

Marlene M. Kinney
Environmental Specialist
Division of Materials and Waste Management

MMK:ddw

Enclosure

cc: Regional Offsite Administrator, DE-9J, USEPA Region V
ec: Natalie Oryshkewych, DMWM, NEDO
Nyall McKenna, DMWM, NEDO
Jeff Mayhugh, DMWM CO

OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

July 28, 2009

RE: HUKILL CHEMICAL CORP.
TSD/LQG/TRANSPORTER
OHD001926740/02-18-0315
CUYAHOGA COUNTY
NOTICE OF VIOLATION

Mr. Tim Jones
EH&S Manager
Hukill Chemical Corporation
7013 Krick Road
Bedford, OH 44146

Dear Mr. Jones:

On June 26, 2009 and July 1, 2009, Kim Gallagher and I conducted a compliance evaluation inspection at Hukill Chemical Corporation (HCC), located at 7013 Krick Road, Bedford, Ohio. We inspected HCC to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). HCC was represented by you and Jeff McGlynn and Ohio EPA was represented by Kim Gallagher and me.

This inspection included a facility walk through, review of outbound manifests and LDR forms, review of in-bound manifests, waste data sheets, weekly and daily inspection checklists, the daily drum inventory log, the daily bulk solvent inventory sheets (by Material and by Tank Location), and the outline from the April 6, 2009 annual refresher training. You also provided me additional paperwork I requested by e-mail.

I have enclosed copies of the inspection checklists for your records and copies of the photographs that I took. During the inspection, I found the following violations of Ohio's hazardous waste laws and noted a number of concerns:

1. Permit Condition C.1(a); The Permittee may not store containers for greater than one year in the container storage room.

During the walk through I noted seven 55-gallon drums of hazardous waste that had been stored in the container storage room for greater than 1 year, in violation of this permit condition. The drums were dated 6/6/08, Manifest ID 83218, profile 11573. The drums were processed on 6/29/2009, thus abating the violation.

2. OAC 3745-54-31 and Permit condition B.1; Design and operation of facility. Facilities shall be designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents.

Housekeeping at the facility was poor at the time of this inspection. I noted the following:

Aisle space was lacking in the permitted container storage room and there was minimal aisle space where the less than 90 day Hukill generator waste is stored in the process room. There was also lack of aisle space where the non-hazardous wastes and the empty drums are stored on the east pad. It was difficult to walk through the rows of drums on the east pad to check them.

The Hochmeyer shaft was being repaired and oil from it had leaked onto the floor underneath the Hochmeyer tank. The oil had not been cleaned up.

Hukill's less than 90 day generator accumulation area is located in the processing area. We noted that 21containers of Hukill generated hazardous waste and a 500 gallon tote of Hukill generated waste were being accumulated in a non-designated area of the facility.

Totes containing an intermediate of the acetonitrile reclamation process were located in many areas of the facility. All the totes holding the acetonitrile intermediate should be located in a dedicated area of the facility where they can be monitored. Hukill will need to dedicate an area for storing these totes.

On June 30, 2009, there was a release of 78% Dimethylaminopropylamine (DMAPA) and 19% Methanol from the still pot while it was being filled. In compliance with OAC Rule 3745-54-56(J) and Permit Condition B.23 Contingency Plan Records, Hukill has filed a report with the Director of the Ohio EPA. I received a copy of the report on July 16, 2009. It appears that Hukill has fulfilled the reporting and clean-up requirements associated with the spill. Hukill should, however, review procedures with staff on managing this material, and all material that is loaded into the still pot, so that a spill does not occur again.

In order to abate this violation, Hukill must provide refresher training for plant personnel, designate an area in the facility where the acetonitrile treatment intermediates will be stored, and provide a report on the status of the Hochmeyer shaft. Other items noted above that are violations will be discussed further on in this letter.

3. OAC 3745-55-73 and Permit condition C.6; Management of Containers.

At the time of the inspection, two 5 gallon metal pails were noted to be open while in storage in the permitted container storage room, in violation of this rule. Although the lids were placed back onto the small containers during the inspection, this violation will not be abated until personnel have had refresher training on hazardous waste management procedures relevant to their positions.

4. OAC 3745-270-50(A)(2)(a); Prohibitions on storage of restricted wastes.

Seven, five gallon metal pails were sitting on a pallet in the drum storage room that were not marked hazardous waste and they did not have an accumulation start date on them. By the second day of the inspection, the material in the five gallon metal pails was processed as fuel.

This violation will not be abated until personnel have had refresher training on hazardous waste management procedures relevant to their positions.

5. OAC3745-279-22-(D); Responses to leaks of used oil.

The Hochmeyer was out of service at the time of the inspection. I noted that oil had leaked onto the floor beneath the Hochmeyer shaft and had not been cleaned up. By the second day of the inspection floor dry had been placed on the floor to absorb the oil and then shoveled into drums. The material will be analyzed prior to disposal. Please send me a copy of the analytical results.

This violation will not be abated until personnel have had refresher training on hazardous waste management procedures relevant to their positions.

6. OAC 3745-54-35 and permit condition B.12; Adequate aisle space.

HCC failed to maintain adequate aisle space to allow unobstructed movement of personnel and equipment in the container storage room. In order to walk through many areas of the container storage room we had to turn sideways to pass through the rows of drums. Aisle space was better on second day of inspection but still inadequate.

This violation will not be abated until personnel have had refresher training on hazardous waste management procedures relevant to their positions and which stresses the need for adequate aisle space. Additionally, please submit pictures demonstrating that adequate aisle space has been provided in the container storage area and in the less than 90 day generator accumulation area.

7. OAC rule 3745-66-74; Generator less than 90 day accumulation area weekly inspections.

Typically, HCC accumulates its generator waste in the <90 day generator storage area located in the Processing Room. During the inspection we noted 21containers of Hukill generated hazardous waste in a non-designated area of the facility. This location can best be described as in the area where the East Pad and the canopy area meet. Five of the drums were from the tank 59 clean out with a generator accumulation date of 6-6-09, 15 were hazardous Tapi Bottoms with a generator accumulation dated of 3/31/09, and one was a stainless steel tote with an accumulation start date of 6/24/09.

Hukill is in violation of this rule for failing to conduct weekly inspections in an area being used as a <90 day generator accumulation area. The drums were moved into the designated <90 day generator accumulation area by the second day of the inspection. This violation will not be abated until plant personnel have had refresher training on hazardous waste management procedures relevant to their positions.

8. OAC 3745-52-20(A)(1); Manifest General Requirements.

Manifest 001863213 from Hukill to Environmental Enterprise, was incorrectly completed. Waste codes D007 and D008 were incorrectly associated with line item 4 on the manifest. Hukill corrected the error and faxed Environmental Enterprise a corrected manifest.

This violation has been abated. No further information is requested.

9. OAC rule 3745-54-16(A)(1); Personnel Training.

Facility personnel must complete training that teaches them to perform their duties in a way that ensures the facility's compliance with the rules.

Hukill provided all employees the annual hazardous waste and hazardous materials training on April 6, 2009. However, Hukill must provide more specific, job oriented training for all plant personnel that work with hazardous waste. At a minimum, the training should cover: labeling and dating containers, closed containers, placing generator waste in the designated <90 day area, maintaining proper aisle space, responding to small spills, safety issues to be aware of when working with ignitable materials, etc.

To document compliance with this rule, please send in a summary of the topics covered, the day or date the refreshers were given, and a sign in sheet.

CONCERNS

A. Ohio EPA is concerned about the volume of containerized hazardous waste that was on site on 6/26/2009 through 7/1/2009. Hukill is authorized to store 68,695 gallons of hazardous waste at any given time in the permitted container areas located in the container storage area, the east pad no free liquids storage area and the staging areas. On 6/26/2009 at 2:56 PM, there were 66,882 gallons of hazardous waste on site according to the storage log. The facility volume did not include two shipments of hazardous waste from Stewart Brothers that had not yet been entered into the container storage log:

   87839 accepted 6/26/2009, 18 drums , 990 gallons
   88379 accepted 6/26/2009, 92 drums, 5060 gallons
   Total unaccounted volume, 5159 gallons.
   Potential volume at 2:56 PM--5159 + 66,882=72,041 gallons

   This rough calculation does not take into account other containers that may not have been entered into inventory or drums that were shipped off-site and had not yet been taken out of inventory. This calculation does, however, illustrate the problems associated with being at container storage capacity.

   Please be advised that the permitted container storage capacity at any one time cannot exceed 68,695 gallons. The permitted capacity includes hazardous waste that has just arrived and is sitting on the loading dock awaiting fingerprint analysis result as well as all hazardous waste ready to be transported off-site but is still sitting on the loading/unloading dock. If it is not in the truck pulling away from the facility, the container volume must be counted toward the facility volume.

B. Hukill reclaims a waste stream from Automated Packaging Systems, approval number 15258. This waste comes into Hukill on a non-hazardous waste manifest as Propyl Alcohol, normal mixture. The waste data sheet profiles this material as an ink and alcohol mixture with a flash point <73 degrees F. The process generating this waste is clean-up from printing operations.

   I asked why this potentially hazardous waste was being transported into Hukill on a non-hazardous waste manifest. I was told that the material was determined to be excluded from regulation as a hazardous waste by the exclusion found in Table 1 of OAC rule 3745-51-02(C)(3); a by-product exhibiting a characteristic of a hazardous waste going for reclamation is not a hazardous waste.

   3745-51-01(C)(3) defines a "by-product" as a material that is not one of the primary products of a production process and is not solely or separately produced by the production process. The process generating this waste on the Waste Data Sheet is "clean up from printing operations". This process does not appear to meet the definition of by-product as defined by the rule.

   HCC must document how this material meets the exemption from the requirement to be managed as a hazardous waste. The documentation must include details on the process generating this waste.

C. The amount of time that containerized hazardous waste remains in the "staging area" on the loading/unloading dock is unacceptable. The permit was modified to allow flexibility in staging drums to allow for greater than 24 hours to unload a truck, obtain a sample for fingerprint analysis, review the results and move the drums into storage. However, the time limit was never removed to allow Hukill to store waste there indefinitely. HCC should develop and implement a procedure to make sure that drums do not remain on the loading dock for more than a week.

D. There is a large amount of non-hazardous waste on site and a large volume that has been on-site for over one year. I counted 18 entries in the container storage log for non-hazardous waste accepted prior to June 2008. The oldest entry is for 4 drums that were accepted on 12/8/2007 and the largest number of drums received on-site is 65 that were accepted 4/21/2008.

   By allowing non-hazardous waste to remain on-site for so long, Hukill runs the risk that the material may undergo physical and chemical changes causing the material to solidify, polymerize, phase separate, etc. This is what recently happened when drums of non-hazardous waste accepted by Hukill on January 30, 2009, were at a later date shipped off-site by Hukill to a downstream facility. (Document number 86441, line 4) Upon arrival at the downstream facility, three of the drums were rejected back to Hukill due to a low flash point. The Hukill lab verified that the 3 drums had a flash point of less than 140 F. Ohio EPA encourages Hukill to process its non-hazardous waste in a timely manner. Be advised that if the drums had been stored in area of the facility other than the permitted container storage room, Hukill may have been storing hazardous waste in an unauthorized area of the facility.

E. There are a large number of empty containers on the East Pad. The empty containers are stored among non-hazardous waste containers, pallets and the acetonitrile treatment intermediate totes. Ohio EPA encourages Hukill to ship as many empty containers off-site as possible.

F. During the facility walk through we noted drums of non-hazardous waste being stored in the warehouse. I asked why a group of drums from Chem Technologies did not have the Hukill acceptance label on them yet. Usually this label is applied to hazardous waste containers and non-hazardous waste containers as soon as they arrive on site. The drums were accompanied by non-hazardous waste manifest (88202). The drums were shipped from the generator on 6/15/2009 yet were not signed as received by Hukill until 6/29/2009. Please explain the delay in signing.

Please reply within 30 days of the date on this letter with the requested responses. Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

You can find copies of the rules and other information on the hazardous waste division's web page at http://www.epa.state.oh.us/dhwm. Ohio EPA also has helpful information about pollution prevention at the following web address: http://www.epa.state.oh.us/opp.

The Division of Hazardous Waste Management has created an electronic news service to provide you with updates related to hazardous waste activities in Ohio. You can find more information and sign up for this free service at the following Web link http://ohioepa.custhelp.com/cgi-bin/ohioepa.cfg/php/enduser/doc_serve.php?2=subscriptionpage

Should you have any questions or concerns, please do not hesitate to call me at (330) 963-1162.

Sincerely,

Marlene M. Kinney

Marlene M. Kinney
Environmental Specialist
Division of Hazardous Waste Management

MMK:ddw

cc: Regional Offsite Administrator, DE-9J, USEPA Region V
Harry Sarvis, DHWM, CO
Natalie Oryshkewych, DHWM, NEDO
ec: Nyall McKenna, DHWM, NEDO
Kim Gallagher, DHWM, NEDO

Land and Chemicals Division

Type of Document:
- ☐ Notice of Violation and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☒ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action
- ☐ Return to Compliance

Facility Name : Hukill Chemical Corporation

Facility Location: 7013 Krick Road

City: Bedford **State: OH**

U.S. EPA ID# OHD 001 926 740

Assigned Staff: Paul Atkociunas **Phone: 6-7502**

Name	Signature	Date
Author	Paul Atk	7/10/09
~~AESC~~ **Regional Counsel**	M Kabrin	7-10-2009
~~AESC~~ **Regional Counsel Section Chief**	N/A	
RCRA Section Chief		7-27-09
RCRA Branch Chief	N/A	

MG 7/14

Directions/Request for Clerical Support:

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   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
   Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

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Paul Atkociunas
U.S. EPA – Region 5
Land and Chemicals Division
RCRA Compliance Section 2
77 W Jackson Blvd
Chicago, IL 60604

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Robert L. Hukill
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146

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C. Signature

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☐ Agent
☐ Addressee

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If YES, enter delivery address below: ☐ No

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JUL 29 2009
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 27 2009

REPLY TO THE ATTENTION OF:
LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert L. Hukill
President
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146

Re: Request for Information
Hukill Chemical Corporation
EPA I.D. No.: OHD 001 926 740

Dear Mr. Hukill:

By this letter, the U.S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of EPA to require you to submit certain information.

This request requires Hukill Chemical Corporation (Hukill, Facility or you) to submit certain information relating to wastes that Hukill received, transported, treated, disposed of, or otherwise handled under agreements with Cylinder Processors Inc. (Cylinder Processors) as well as information relating to the nature and characteristics of such wastes. This request pertains to Cylinder Processors' installation located at 1415 Grandin Road, Maineville, Ohio (EPA ID No.: OHR 000 132 365).

We are requiring this information for the purpose of enforcing Sections 3002, 3003, 3004, and/or 3005 of RCRA and their implementing regulations. Attachment 1 specifies the information you must submit. You must submit this information within fifteen (15) calendar days of receiving this request to the U.S. EPA, Attention: Paul Atkociunas, 77 West Jackson Boulevard, Mail Code LR-8J, Chicago, Illinois 60604.

You may, under 40 C.F.R. Part 2, Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 C.F.R. § 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 C.F.R. Part 2, Subpart B. You

must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

Hukill Chemical Corporation must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject Hukill to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928. You should direct questions about this request for information to Paul Atkociunas at (312) 886-7502.

Sincerely,

Paul Little, Chief
RCRA Branch
Compliance Section 2

Enclosures

ATTACHMENT 1

Instructions: You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds. Where documents are only retained in electronic form, please provide copies of these documents as well.

All questions or requests set forth pertain to Cylinder Processors Inc., 1415 Grandin Road, Maineville, Ohio (EPA ID No.: OHR 000 132 365). For the purposes of this request, the 'waste acetone' shall refer to the waste acetone transported by, or shipped to Hukill Chemical Corporation (EPA ID No.: OHD 001 926 740) from Cylinder Processors.

Requests

1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified.

2. From the time period of July 7, 2004, through the present date, state whether Hukill Chemical Corporation sampled or caused to be sampled the waste acetone for chemical or physical analysis. If such wastes were analyzed, provide true, accurate and complete copies of all analytical data pertaining to the identified wastes, including but not limited to all sampling data, analytical reports, and chain-of-custody forms.

3. Provide true, accurate, and complete copies of all documents which describe, identify, or otherwise relate to the source of the waste acetone.

4. Provide true, accurate, and complete copies of all documents reflecting the waste characterizations for the waste acetone, including but not limited to sampling data, analytical reports, laboratory data, material safety data sheets, waste approval forms, and certifications.

5. Provide true, accurate, and complete copies of all manifests documenting transportation and/or shipment of the waste acetone.

6. For the waste acetone that was received by Hukill Chemical Corporation, describe how and where the waste acetone was treated, handled, stored, transported and/or disposed of. Include a description of the process and end use for each shipment of waste acetone received by Hukill.

7. Provide the following certification by a responsible corporate officer:

   I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request

for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

State of Ohio Environmental Protection Agency

Northeast District Office

10 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

March 11, 2009

RE: HUKILL CHEMICAL CORPORATION
TSD/LQG/TRANSPORTER
OHD001926740/02-18-0315
CUYAHOGA
NOV/PRTC

Mr. Tim Jones
EH&S Manager
Hukill Chemical Corporation
7013 Krick Road
Bedford, OH 44146

Dear Mr. Jones:

On February 24 and 26, 2009, I conducted a compliance evaluation inspection at Hukill Chemical Corporation (HCC), located at 7013 Krick Road, Bedford, Ohio. I inspected HCC to determine its compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). HCC was represented by Jeff McGlynn on February 24 and by you on February 26. Ohio EPA was represented by me.

This inspection included a facility walk through, review of outbound manifests and LDR forms, review of inbound manifests and their corresponding waste processing sheets, weekly and daily inspection checklists, waste profile sheets, the daily drum inventory log, and the daily bulk solvent inventory sheet. The annual hazardous waste refresher training is scheduled to be given on April 6, 2009. The contingency plan was not reviewed during the inspection since it can be found in the part B permit application.

I have enclosed copies of the inspection checklists for your records and copies of the photographs that I took. During the inspection, I found the following violations of Ohio's hazardous waste laws:

1. **Permit Condition C.1(a). The Permittee may not store containers of hazardous waste in an area that is not authorized by the terms and conditions of the hazardous waste operating permit.**

   During the facility walk through I noted at least forty nine, 55 gallon drums sitting on the East Pad under the canopy. While I was inspecting that set of drums, another group closer to the manifold area was being moved back into the container storage room. I was unable to determine how many drums were in the second group.

   When I first arrived at the facility I was told that on February 20, 2009, the auger became inoperable and the facility is waiting for a replacement part to arrive. I was also told that the drums I noticed in the unauthorized area had been placed on the East Pad the morning of the 24th to make it easier to get to the auger. I suggested that a better place to store the drums until the auger is repaired would be in the staging areas since the permit authorizes those areas for temporary storage of containers of hazardous waste. I also discussed that in the future I should be notified anytime a piece of equipment used in hazardous waste management malfunctions, and that the event must be documented in the facility's operating record by noting the problem on the correct inspection checklist(s).

The violation was abated by the afternoon of the first day of the inspection when I verified that the drums had been moved back into the container storage room. However, to demonstrate compliance with the operating record requirements, please submit to my attention the following:

a. Inspection checklist(s) that note the days that the auger was out of service;
b. the number of hazardous waste containers that had to be stored in the staging areas while the auger was down; and,
c. paperwork documenting that the auger has been repaired.

2. **Ohio Administrative Code (OAC) 3745-273-13(D)(1). Standards for universal waste lamps, failure to store lamps in a closed container; and**

3. **OAC rule 3745-273-14(E). Labeling requirements.**

There were a number of closed and properly labeled cardboard boxes containing universal waste lamps stacked in the area where universal waste and electronic waste are stored. Somewhere in the middle of the pile of boxes were roughly ten, fluorescent bulbs that were taped together but were not containerized or appropriately labeled. The lamps had been shipped to Hukill in that manner. I suggested that the bulbs be placed into a cardboard box. On February 26, 2009, I observed that the lamps had been placed into a labeled and closed cardboard box. **These UW violations have been abated and no further information is requested.**

4. **Permit condition D.6 (b) and (e). Inspection Schedules and Procedures.**

During the facility walk through, as we walked by the 7-Tank dike where 7 hazardous waste store tanks are located, I asked how the facility tests that the high level alarms are working. I was told that they are not tested since they no longer work and that tanks 57 and 59, located in the 7-Tank dike, have been taken out of service.

Hukill is in violation of this permit condition for failing to record on the inspection checklists that the high level alarms no longer work. The checklist used for the inspections is found on page 000343 of the permit. None of the checklists that were reviewed during this inspection or the last several inspections note that the high level alarms are not working. To demonstrate a return to compliance, Hukill must do the following:

a. Determine if any of the high level alarms in the 7-tank dike work.
b. Verify that tanks 52, 53 and 55 have operating high level alarms.
c. Provide a time line for new high level alarm installation on those tanks that need one.
d. For those tanks with high level alarms that don't work describe the management practices being used to make sure that overfill does not occur.

The inspection checklist found in the Part B permit application (Exhibit F-7 permit application paged 000343) should be updated to contain only items that are actually inspected daily. The modified checklist will need to be submitted as a permit modification.

On March 11, 2009, I received by email HCC's response to the above violation. The response discussed in detail the four items outlined above. The management practice being used to make sure that overfill does not occur on those tanks without high level alarms appears to be working. Ohio EPA finds the replacement schedule for the high level alarms acceptable and acknowledges that economic conditions may cause adjustment to the time table such that high level alarms may be replaced over a longer period of time than initially outlined.

Based on the information in your letter received on March 11, 2009, the violation has been abated.

5. Permit Condition D.7(a) and (b). Response to spills and leaks.

If a tank system becomes unfit for continual use, the Permittee must close its tank system in accordance with OAC Rule 3745-55-97 and its closure plan.

Two permitted hazardous waste storage tanks have been taken out of service, Tank 57 and Tank 59. Permit condition D.7 (a) states, in part, that if a tank system becomes unfit for continued use, it must be taken out of service immediately. Unless the tank can be repaired and placed back into service, the Permittee must close its tank system in accordance with OAC Rule 3745-55-97 and its closure plan.

In order to abate this violation HCC must close Tanks 57 and 59. The partial tank closure plan can be found on page 000469 of the Part B permit application. Please provide a timeline for closure of these tanks and the dates they were taken out of service.

We discussed what is meant by inspection of a tank system once each operating day. The way that the rule is interpreted has changed. Inspecting a tank system once each operating day does not mean each day the facility is open for business, rather, it has been interpreted to mean each day a tank is holding hazardous waste. This interpretation can be found in ***Large Quantity Generator Tank Systems Requirements, June 2008:***

> ***Ohio EPA interprets the requirement to inspect a tank "once each operating day" to be once each day that the tank system is being used to manage (accumulate or treat) hazardous waste. When employees are not present 7 days a week, there is a possibility to use a remote camera system, which could be used to inspect the tank system components required to be inspected each operating day. To satisfy the requirements of OAC rule 3745-66-95(A), the inspections must be documented, even when using a remote camera system.***

Hukill will need to develop an inspection plan to insure that the hazardous waste storage tanks are inspected on those days that the facility isn't operating.

Please respond within 30 days of the date on this letter with the requested information. Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

You can find copies of the rules and other information on the hazardous waste division's web page at http://www.epa.state.oh.us/dhwm. Ohio EPA also has helpful information about pollution prevention at the following web address: http://www.epa.state.oh.us/opp.

The Division of Hazardous Waste Management has created an electronic news service to provide the regulated community with news related to hazardous waste activities in Ohio. If you haven't already, we encourage you to sign up for this free service by going to http://www.epa.state.oh.us/dhwm/listserv.

Should you have any questions or concerns, please do not hesitate to call me at (330) 963-1162.

Sincerely,

Marlene M. Kinney

Marlene M. Kinney
Environmental Specialist
Division of Hazardous Waste Management

MMK:ddw

cc: Regional Offsite Administrator, DE-9J, USEPA Region V
Harry Sarvis, DHWM, CO
Natalie Oryshkewych, DHWM, NEDO
ec: Nyall McKenna, DHWM, NEDO

Waste, Pesticides and Toxics Division

Type of Document:
- ☐ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action
- ☒ Return to Compliance

Facility Name : Hukill Chemical

Facility Location: 7013 Krick Road

City: Bedford **State:** OH

U.S. EPA ID# OHD 001 926 740

Assigned Staff Michael Cunningham **Phone:** 64464

Name	Signature	Date
Author		3-21-07
Regional Counsel		
Section Chief		3.21.07
Branch Chief		

Directions/Request for Clerical Support:

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4. Mail the original certified mail and distribute office copies and cc's and bcc's.
   Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 23 2007

REPLY TO THE ATTENTION OF:

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Timothy C. Jones
Environmental, Health and Safety Manager
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146-4493

Re: Hukill Chemical Corporation
EPA I.D. No.: OHD 001 926 740

Dear Mr. Jones:

On May 17, 2006, representatives of the United States Environmental Protection Agency (U.S. EPA) and the Ohio Environmental Protection Agency (OEPA) inspected Hukill Chemical Corporation (Hukill) located in Bedford, Ohio. In response to violations of the hazardous waste organic air emission standards identified during the inspection, U.S. EPA issued a Notice of Violation to Hukill on December 14, 2006. Subsequent to U.S. EPA's Notice of Violation you submitted additional information regarding the identified violation in correspondence dated February 5, 2007.

This letter is to inform you that U.S. EPA has reviewed the referenced response, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. U.S. EPA and the OEPA will continue to evaluate Hukill in the future.

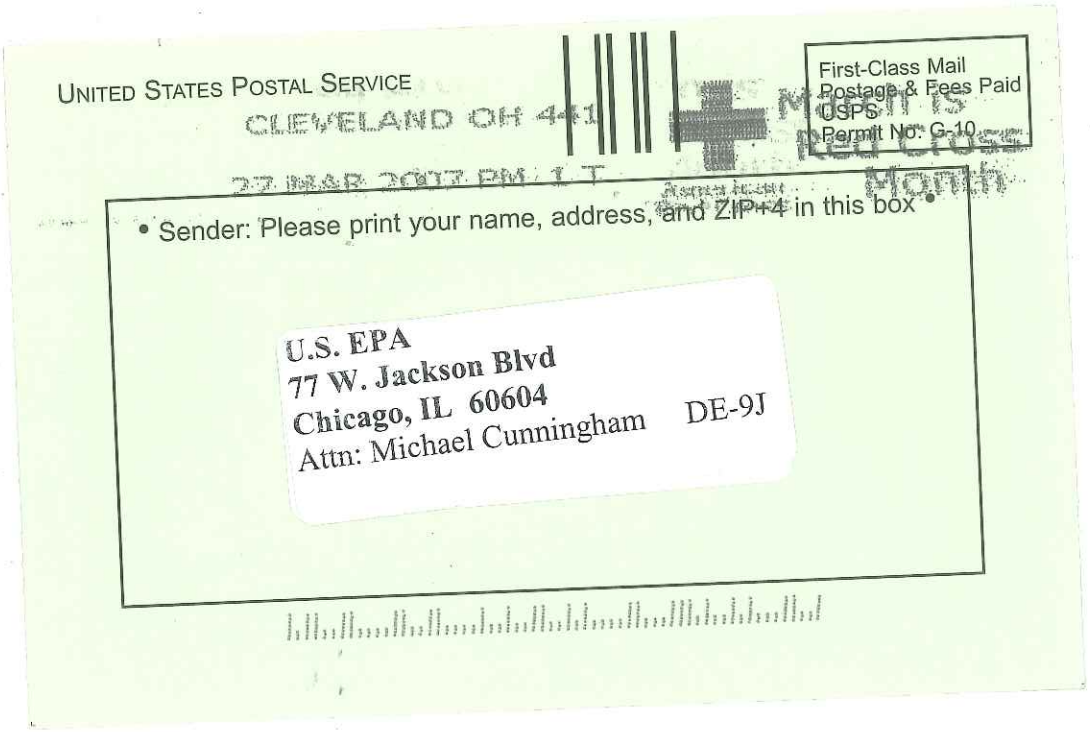
If you have any questions or concerns regarding this matter, please contact Michael Cunningham at (312) 886-4464.

Sincerely,

Paul Little

Paul Little, Chief
Enforcement and Compliance Assurance Branch
Compliance Section 2

cc: Marlene Kinney, OEPA, NEDO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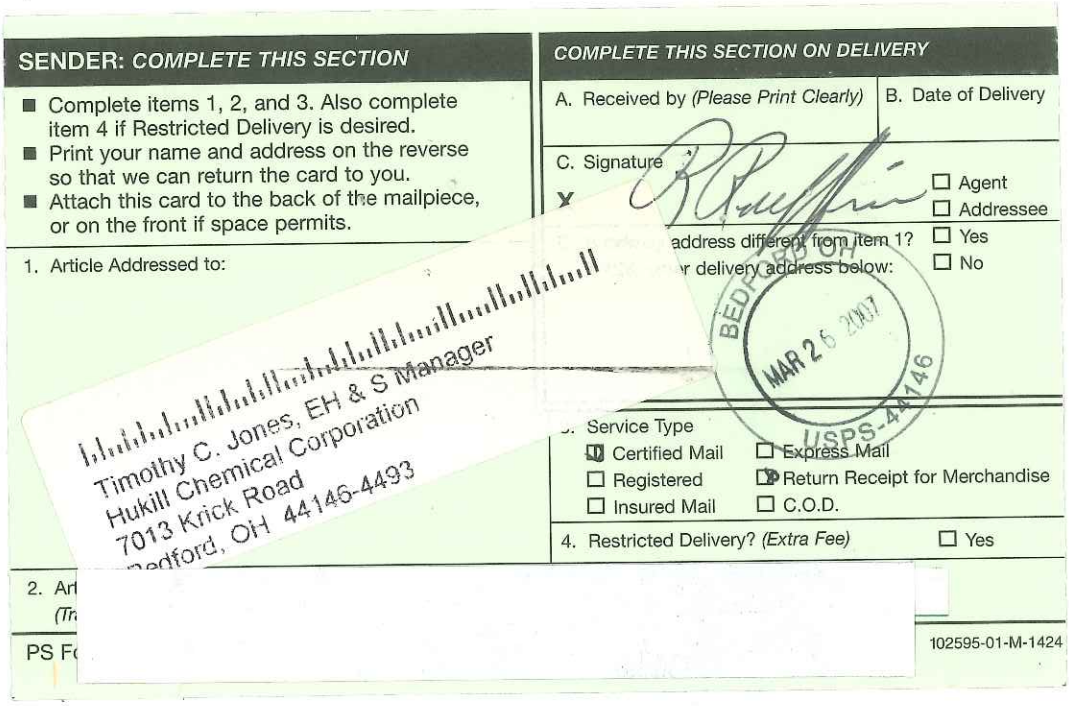
Chicago, IL 60604
Attn: Michael Cunningham DE-9J



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1. Article Addressed to:

Timothy C. Jones, EH & S Manager
Hukill Chemical Corporation
7013 Krick Road
Bedford, OH 44146-4493

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A. Received by *(Please Print Clearly)* | B. Date of Delivery

C. Signature

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☐ Agent
☐ Addressee

address different from item 1? ☐ Yes
r delivery address below: ☐ No

BEDFORD OH
MAR 26 2007
USPS-44146

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4. Restricted Delivery? *(Extra Fee)* ☐ Yes

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102595-01-M-1424

Waste, Pesticides and Toxics Division

Type of Document:
- ☒ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action
- ☐ Return to Compliance

Facility Name : Hukill Chemical

Facility Location: 7013 Krick Rd.

City: Bedford **State:** OHIO

U.S. EPA ID# OHD 001 926 740

Assigned Staff Mike Cunningham **Phone:** 6-4464

Name	Signature	Date
Author		12-7-06
Regional Counsel		12-7-06
Section Chief	for P Little	12/13/06
Branch Chief		

cc: Robert Thompson

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
   Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 14 2006

REPLY TO THE ATTENTION OF:
DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Vince Valentino, VP, General Manager
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146

Re: Notice of Violation
Compliance Evaluation Inspection
EPA I.D. No.: OHD 001 926 740

Dear Mr. Valentino:

On May 17, 2006, representatives of the United States Environmental Protection Agency (U.S. EPA) and the Ohio Environmental Protection Agency (OEPA) inspected the Hukill Chemical Corporation (Hukill) located in Bedford, Ohio. The purpose of the inspection was to evaluate Hukill's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA). The U.S. EPA representative evaluated Hukill's compliance with specific regulations related to organic air emission standards for hazardous waste generators and treatment, storage and disposal facilities found at 40 CFR 265, Subparts AA, BB, and CC. A copy of the inspection report for U.S. EPA's evaluation is enclosed for your reference.

Based on information provided by Hukill personnel, review of records, and physical observations by the inspector, U.S. EPA has determined that Hukill is in violation of the following requirements:

1. The State of Ohio's authorized RCRA Program does not include RCRA Subpart BB air emission control requirements for hazardous waste storage facility equipment. Therefore federal RCRA Subpart BB requirements apply to the facility, and, because the facility has fully complied with the requirements for interim status, the requirements of 40 CFR Part 265, rather than Part 264, apply. See, 40 CFR §§ 265.1(b). Accordingly, 40 CFR §265.1050(c) requires owners and operators to mark each piece of equipment to which 40 CFR Part 265, Subpart BB applies. At the time of the inspection several pieces of equipment which contact hazardous waste with organic concentrations of at least 10 percent by weight, including two portable pumps located in the room next to the processing and reclamation area and valves on piping from this room to tanks 8, 10, and 11, were not marked.

2. The State of Ohio's authorized RCRA Program does not include RCRA Subpart BB air emission control requirements for hazardous waste storage facility equipment. Therefore federal RCRA Subpart BB requirements apply to the facility, and, because the facility has fully complied with the requirements for interim status, the requirements of 40 CFR Part 265, rather than Part 264, apply. See, 40 CFR §§ 265.1(b). Accordingly, 40 CFR §265.1064(b) requires owners and operators to record specific information for each piece of equipment to which 40 CFR Part 265, Subpart BB applies. At the time of the inspection Hukill did not have a complete record of each piece of equipment to which 40 CFR Part 265, Subpart BB, applies, and their locations within the facility.

3. The State of Ohio's authorized RCRA Program does not include RCRA Subpart BB air emission control requirements for hazardous waste storage facility equipment. Therefore federal RCRA Subpart BB requirements apply to the facility, and, because the facility has fully complied with the requirements for interim status, the requirements of 40 CFR Part 265, rather than Part 264, apply. See, 40 CFR §§ 265.1(b). Accordingly, 40 CFR §265.1052(a)(1) requires owners and operators to conduct monthly monitoring of each pump in light liquid service to detect leaks. 40 CFR §265.1057(a) requires owners and operators to conduct monthly monitoring of each valve in light liquid service to detect leaks. At the time of the inspection Hukill personnel acknowledged that leak detection monitoring of pumps and valves was not conducted during December of 2005. In addition, Hukill could not produce leak detection monitoring records for August, September, November, or December of 2004, or April, May, June, July, August, and December of 2005.

4. The State of Ohio's authorized RCRA Program does not include RCRA Subpart CC air emission control requirements for hazardous waste storage facility containers. Therefore federal RCRA Subpart CC requirements apply to the facility, and, because the facility has fully complied with the requirements for interim status, the requirements of 40 CFR Part 265, rather than Part 264, apply. See, 40 CFR §§ 265.1(b). Accordingly, 40 CFR §265.1087(c)(3) requires owners and operators to maintain covers on a container holding hazardous waste in the closed position. At the time of the inspection the cover on the blow over tote containing hazardous waste solvent was not in the closed position.

According to Section 3008(a) of RCRA, U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office documenting the actions, if any, which have been taken since the inspection to establish compliance with the above requirements.

You should submit your response within 30 days upon receipt of this notice to Michael Cunningham, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, DE-9J Chicago, Illinois 60604. You should also send a copy of your response to Marlene Kinney, Ohio Environmental Protection Agency Northeast District Office, 2110 East Aurora Road, Twinsburg, Ohio 44087.

If you have any questions regarding this letter, please contact Michael Cunningham, of my staff, at (312) 886-4464.

Sincerely,

for Paul Little, Chief
Compliance Section 2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure

cc: Marlene Kinney, OEPA, NEDO w/enc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, WPTD, ECAB, DE-9J
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Hukill Chemical Corporation
EPA ID No.: OHD 001 926 740

ADDRESS: 7013 Krick Road
Bedford, Ohio 44146

DATE OF INSPECTION: May 17, 2006

EPA INSPECTOR: Michael Cunningham, Region 5

STATE INSPECTOR: Marlene Kinney, Northeast District Office

PREPARED BY: Michael Cunningham — June 22, 2006
Date Completed

ACCEPTED BY: P. R Little — 6-28-06
Paul Little, Chief
Compliance Section # 2
Date

Purpose of Inspection
This inspection was an evaluation of Hukill Chemical Corporation's (Hukill) compliance with the hazardous waste regulations found at 3745-52 of the Ohio Administrative Code and 40 Code of Federal Regulations Parts 262 through 279. The inspection was a joint RCRA Compliance Evaluation Inspection. The U.S. EPA inspector evaluated Hukill's compliance with the Air Emission Standards set forth in 40 CFR Part 265, Subparts AA, BB and CC.

Participants
Federal Inspector: Michael Cunningham, U.S. EPA Region 5
State Inspector: Marlene Kinney, OEPA, Northeast District
Representatives of Hukill: Marian Gammon, EHS Manager, Jeff McGlynn, Acid and Waste Processing Manager

Introduction
The inspectors arrived at the site at approximately 10:00 AM. I introduced myself, presented my inspector credentials and identification, and described the purpose of the inspection. Ms. Gammon and Mr. McGlynn provided a verbal description of the site and led the tour. They also provided the records the inspectors requested for review. I provided a Small Business Resources information sheet to Ms. Gammon.

Site Description
Hukill is a chemical distribution and solvent recovery facility. The company has been operating at this location since 1968, and has approximately 60 employees. Spent solvents are reclaimed in either of two LUWA thin film evaporators (L050 and L411) or a fractional distillation column. Hazardous waste is also blended and shipped off site for use as a supplemental fuel in kilns. Ohio EPA issued Hukill a hazardous waste treatment and storage permit (Number 02-18-0315) on August 30, 1998. Hazardous waste that cannot be reclaimed or blended is sent to Ross Incineration for disposal.

The two LUWA thin film evaporators are connected to a glycol-based chilled condenser which acts as a volatile organic compound (VOC) emission control device. A backwash tank associated with the LUWAs holds reclaimed solvent which is used to rinse out the LUWA units at the end of a process run. The spent solvent from the LUWA rinse is sent back into the wash out tank, and then sent to the fuel blending tanks.

The fractional distillation column is connected to an overflow tank which collects the VOC emissions. This overflow tank is equipped with a conservation vent. This tank also has a feed line which drains to a "blow over tote" that collects the solvent from the tank. This tote had a design capacity of greater than 55 gallons. Ms. Gammon stated that the blow over tote is managed as a satellite accumulation container, and is checked daily and emptied before accumulating more than 55 gallons of solvent. The solvent from the tote is either sent to the fuel blending operation or put back through the distillation process.

There are currently eighteen hazardous waste tanks on site. Tanks 8, 10, and 11 are process feed tanks located in the processing and reclamation room. Spent solvent from drums is pumped into these tanks, and then fed to the LUWAs or distillation column. Tank 9 is also located in the processing and reclamation room, and is used for the storage of still bottoms from the LUWAs. These still bottoms are pumped from the LUWAs to tank 9, and then piped to the fuel blending tanks. Tanks 13, 14, 15 and 16 are located next to the east warehouse drum storage and

processing area. Waste from drums and the LUWA still bottoms are transferred into these tanks and blended for use as a supplemental fuel. Tanks 52, 53, 55, 56, 57, 58, 59, 60, 61, and 62 are spent solvent storage tanks. All of the tanks have a capacity of less than 20,000 gallons, and have a fixed roof fitted with a conservation vent.

The room next to the processing and reclamation room has an Auger mixing tank and a Hockmeyer mixing tank used for mixing heavy material that cannot be reclaimed. This waste is consolidated and sent off site for disposal. This room is also used as a process area for fuel blending and solvent reclamation.

Site Tour

The inspectors toured the tank, drum storage, and waste processing areas of the site. Hukill provided a leak detection monitoring data sheet which listed equipment that was subject to the monitoring requirements of 40 CFR Part 265, Subpart BB. The U.S. EPA inspector checked equipment that was identified on this sheet. The inspector observed two portable pumps located in the room next to the processing and reclamation area. Ms. Gammon stated that these pumps are used for pumping spent solvent to the reclamation process. The pumps were not marked, and there were no monitoring records associated with them. In addition, valves on piping from this room to tanks 8, 10, and 11 were not marked. The blow over tote associated with the LUWA contained hazardous waste. The tote had a lid with a cover, but was not closed at the time of the inspection.

Record Review

The U.S. EPA inspector reviewed records associated with the requirements of 40 CFR Part 265 Subpart AA, BB, and CC. Hukill provided the monthly leak detection monitoring results conducted by Custom Stack Analysis between December of 2003 and May of 2006. Ms. Gammon stated that they may have missed conducting the monitoring in December of 2005. There were no records for August, September, November, or December of 2004, or April, May, June, July, August, and December of 2005. Hukill did not have a plot plan which identified the location of all of the equipment that was subject to the monitoring requirements of 40 CFR Part 265, Subpart BB. Hukill provided VOC emission sampling results of the LUWA lines conducted by Envisage Environmental Incorporated on May 11, 2004, as well as a Subpart CC Tank Inspection /Maintenance log for the hazardous waste tanks.

Closing Conference

I summarized our review of the site and told the facility U.S. EPA would send a report regarding compliance with the Air Emission Standards set forth in 40 CFR Part 265, Subparts AA, BB and CC.

Checklists for Subparts AA, BB and CC are attached to this report.

INTERIM STATUS FACILITIES ORGANIC AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS

Facility's Name Hull Chemical

Date May 17, 2006 ID# OHD 001 926 740

. Use of the words "process vents" means process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction or air or steam stripping operations managing hazardous waste with organic concentrations of at least 10 ppmw (time weight annual average basis).

Note: Total Organic Emissions shall be abbreviated to TOE

Note: Equipment with closed-vent systems and control devices shall comply with the provisions of section 265.1033.

(rev. 7/3/96 - EAB-MDEQ)

NI - not inspected **N/A - not applicable**

	YES	NO	NI	N/A

APPLICABILITY (40 CFR 265.1050)

1. If the equipment contains or contacts hazardous waste w/ organic concentrations of at least 10 percent by weight:		
a) Are the units subject to the permitting requirements of part 270? (265.1050(b)(1))	DAE	*
OR		
b) Are there hazardous waste recycling units located at the facility that are otherwise subject to the permitting requirements? (265.1050(b)(2))	DAE	Yes *

* If the answers to the above questions are no the following regulations do not apply.

STANDARDS: PUMPS IN LIGHT LIQUID (40 CFR 265.1052)

Note: Delays in repair are allowed see 265.1059 (#37)

Note: Did the owner/operator subject to the provisions of this subpart comply with the required test methods and procedures: (265.1063(b-I)) (#41)

2. Pump equipped w/ duel mechanical seal system that includes a barrier fluid system? If yes, its exempt from monthly monitoring (#5) and visual inspections (#6) if: (265.1052(d))			NI N/A
a) Each duel mechanical seal system is:			
I) Operated with a barrier fluid with pressure greater than the pump stuffing box pressure. (265.1052(d)(1)(I))	DAE	[ ]	NI N/A
OR			
ii) Has a barrier fluid degassing reservoir connected by closed-loop to a control device. (265.1052(d)(1)(ii))	DAE	[ ]	NI N/A
OR			
iii) System that purges the barrier fluid into a hazardous waste stream w/no detectable emissions? (265.1052(d)(1)(iii))		[ ]	NI N/A
b) Barrier fluid is not a hazardous waste w/ organic concentrations 10% or greater by weight. (265.1052(d)(2))	DAE	[ ]	NI N/A
c) Each barrier fluid system equipped w/ a sensor to detect failure of the seal/barrier fluid system. (265.1052(d)(3))	DAE	[ ]	NI N/A
d) Each calendar week pump has visual inspection for signs of liquids dripping from pump seals. (265.1052(d)(4))	DAE	[ ]	NI N/A
e) Each sensor is checked: (265.1052(d)(5)(I))			
I) Daily.	DAE	[ ]	NI N/A
OR			
ii) Equipped with audible alarm that is checked monthly to see if working.	DAE	[ ]	NI N/A
f) Owner/operator has determined a criteria indicating failure of the seal/barrier fluid system. (265.1052(d)(5)(ii))	DAE	[ ]	NI N/A
g) Indications of liquids dripping from pump seal/sensor means failure of seal/barrier fluid system & a leak has been detected: (265.1052(d)(6)(I))			
I) Was it repaired as soon as practicable but no later than 15 calendar days after detected? (265.1052(d)(6)(ii))	DAE	[ ]	NI N/A
ii) A first attempt at repair was made no later than 5 calendar days after leak is detected? (265.1052(d)(6)(iii))	DAE	[ ]	NI N/A
The pump designed as in 264.1064(g)(2) for no detectable emissions as indicated by an instrument reading of < 500 ppm above background? Yes, pump exempt from monthly monitoring (#5), visual monitoring (#6), repairs (#7a & #7b) and barrier fluid system (#2) if: (265.1052(e))			NI N/A
a) It does not have an externally actuated shaft penetrating the pump housing. (265.1052(e)(1))	DAE	[ ]	NI N/A

		YES	NO	NI	N/A
b) It operates with no detectable emissions as indicated w/ emission reading of < 500 ppm. (265.1052(e)(2))	DAE	[ ]		NI	N/A
c) Is tested for compliance initially, annually and when requested by Regional Administrator. (265.1052(e)(3))	DAE	[ ]		NI	N/A
4. Is the pump equipped with a closed-vent system capable of capturing and transporting any leakage from seal(s) to the control device? If yes, the pump is exempt from monthly monitoring (#5), visual monitoring (#6), repairs (#7a & #7b), barrier fluid system (#2) and no detectible emission (#3). (265.1052(f))	DAE			NI	N/A
5. Is each pump in light liquid service monitored monthly to detect leaks? (265.1052(a)(1))	DAE	[ ]	✓	NI	N/A
6. Does each pump in light liquid service have a visual inspection each calendar week for indications of liquid dripping? (265.1052(a)(2))	DAE	[ ]	✓	NI	N/A
7. Was an instrument reading of 10,000 ppm or greater measured or were there are any indications of liquids dripping from the pump seal? If yes, a leak is detected and:	DAE		✓	NI	N/A
a) Was it repaired as soon as practicable but no later than 15 calendar days after detected? (265.1052(c)(1))	DAE	[ ]		NI	N/A
b) Was a first attempt at repair made no later than 5 calendar days after leak is detected? (265.1052(c)(2))	DAE	[ ]		NI	N/A

STANDARDS: COMPRESSORS (40 CFR 265.1053)

NOTE: Delays in repair are allowed see 265.1059 (#37)

8. Is the compressor designed as described in 265.1064(g)(2), for no detectable emissions indicated by instrument reading of < 500 ppm above background? If yes the compressor is exempt from seal system and operation (#10-11), barrier fluid concentration (#12), barrier system sensor(#13-14), criteria for failure (#15), leak detection/repair (#16) and closed-vent (#9). (265.1053(I))	DAE			NI	N/A
9. Is the compressor equipped with a closed-vent system capable of capturing and transporting leakage from the seal(s) to a control device in compliance w/ 265.1060? If yes, the compressor is exempt from seal system (#10) and seal system operation (#11). (265.1053(h))	DAE			NI	N/A
10. Each compressor equipped w/ seal system that has barrier fluid system that prevents leakage of TOE? (265.1053(a))	DAE	[ ]		NI	N/A
11. Is each compressor seal system: (265.1053(b))					
a) Operated with the barriers fluid at a greater pressure than the stuffing box pressure? (265.1053(b)(1))	DAE	[ ]		NI	N/A
OR					
b) Equipped with a barrier fluid system connected by a closed-vent system to a control device? (265.1053(b)(2))	DAE	[ ]		NI	N/A
OR					
c) Equipped with a system that purges the barrier fluid system with no detectable emissions? (265.1053(b)(3))	DAE	[ ]		NI	N/A
12. Is the barrier fluid system a hazardous waste w/ an organic concentration of 10% or greater by weight? (265.1053(c))	DAE		[ ]	NI	N/A
13. Each barrier system equipped w/ a sensor to detect failure of the seal/barrier fluid system? (265.1053(d))	DAE	[ ]		NI	N/A
14. Is each barrier system sensor checked: (265.1053(e)(1))					
a) Daily?	DAE	[ ]		NI	N/A
OR					
b) Equipped with audible alarm that is checked monthly to see if working?	DAE	[ ]		NI	N/A
UNLESS					
c) The compressor is located at an unmanned plant then is the sensor checked daily?	DAE	[ ]		NI	N/A
15. Has the owner/operator determined a criterion to indicate failure of the seal/barrier fluid system? (265.1053(e)(2))	DAE	[ ]		NI	N/A
16. Did the sensor indicates failure of the seal/barrier fluid system? If yes, a leak is detected and: (265.1053(f))	DAE			NI	N/A

		YES	NO	NI	N/A
a) Was it repaired as soon as practicable but no later than 15 calendar days after detected? (265.1052(g)(1))	DAE	[ ]		NI	N/A
b) Was a first attempt at repair was made no later than 5 calendar days after leak is detected? (265.1052(g)(2))	DAE	[ ]		NI	N/A

STANDARDS: PRESSURE RELIEF DEVICES IN GAS/VAPOR SERVICE (40 CFR 265.1054)

NOTE: Delays in repair are allowed see 265.1059 (#37)

17. Is the pressure relief device equipped with a closed-vent system capable of capturing and transporting leakage to a control devices specified in 265.1060? If yes, the device is exempt from relief device monitored for no detectable emissions (#18), specifications to reset device and time frame (#19 & #20). (265.1054(c))	DAE		NI	N/A
18. Pressure relief devices in gas/vapor service operated w/ no detectable emissions indicated by an instrument reading of <500 ppm above background, except during pressure releases? (265.1054(a))	DAE	[ ]	NI	N/A
19. After a pressure release, was the device returned to a condition of no detectable emissions indicated by an instrument reading of <500 ppm above background, as soon as practical but no later than 5 calendar days? (265.1054(b)(1))	DAE	[ ]	NI	N/A
20. No later than 5 calendar days after a pressure release, is the pressure relief device monitored to confirm no detectable emissions indicated by an instrument reading of <500 ppm above background,? (265.1054(b)(2))	DAE	[ ]	NI	N/A

STANDARDS: SAMPLING CONNECTING SYSTEMS (40 CFR 265.1055)

21. Is the sampling system *in situ*? If yes, the system isn't required to have closed-vent or closed-purge system (#22 & #23). (265.1055(c))	DAE		NI	N/A
22. Is each sampling connection system equipped with a closed-purge system or closed-vent system? (265.1055(a))	DAE	[ ]	NI	N/A
23. Does each closed-purge or closed-vent system: (265.1055(b))				
a) Return purged hazardous waste stream directly to hazardous waste management process line w/ no detectable emissions? (265.1055(b)(1))	DAE	[ ]	NI	N/A

OR

b) Collect and recycle the purged hazardous waste stream with no detectable emissions? (265.1055(b)(2))	DAE	[ ]	NI	N/A

OR

c) Designed/operated to capture/transport all purged hazardous waste stream to a control device? (265.1055(b)(3))	DAE	[ ]	NI	N/A

STANDARDS: OPEN-ENDED VALVES OR LINES (40 CFR 265.1056)

Note: Delays in repair are allowed see 265.1059 (#37)

Note: Did the owner/operator subject to the provisions of this subpart comply with the required test methods and procedures: (265.1063(b-I)) (#41)

24. Is each open-ended valve or line equipped with a cap, blind flange, plug or second valve? (265.1056(a)(1))	DAE	[ ]	NI	N/A
25. Cap/blind flange/plug/second valve always seal open end except when waste must flow through? (265.1056(a)(2))	DAE	[ ]	NI	N/A
26. If using a second valve, is the first valve closed before the second? (265.1056(b))	DAE	[ ]	NI	N/A
27. If a double block and bleed system is used and the bleed line/valve stays open during venting, is the line between the block valves have cap/blind flange/plug/second value and sealed at all other times? (265.1056(c))	DAE	[ ]	NI	N/A

STANDARDS: VALVES IN GAS/VAPOR SERVICE OR IN LIGHT LIQUID SERVICE (40 CFR 265.1057)

Note: There are alternate standards for valves in gas/vapor or light liquid service where owners/operators may elect to have all valves within a hazardous waste management unit comply with alternative standards which: (1) allows no greater than 2% of the valves to leak. (265.1061(a-d) and (2) allows for skip period leak detection and repair. (265.1062(a-b))

Note: Delays in repair are allowed see 265.1059 (#37)

?. Valve designated as an unsafe-to-monitor valve as described in 265.1064(h)(1). If yes, the valve is exempt from monthly monitoring (#31) if: (265.1057(g))	DAE		NI	N/A

		YES	NO	NI	N/A
a) The owner/operator of the valve determines that the valve would be unsafe to monitor because monitoring personnel would be exposed to an immediate danger. (265.1057(g)(1))	DAE	[ ]		NI	N/A
b) The owner/operator of the valve adheres to a written plan that requires monitoring of the valve as often as possible during safe-to-monitor times. (265.1057(g)(2))	DAE	[ ]		NI	N/A
29. Valve designated as a difficult to-monitor valve in 265.1064(h)(2). If yes, the valve is exempt from monthly monitoring (#31) if: (265.1057(h))	DAE			NI	N/A
a) The owner/operator of the valve determines the valve cannot be monitored without elevating personnel more than 2 meters above a support surface. (265.1057(h)(1))	DAE	[ ]		NI	N/A
b) Hazardous waste management unit where valve is located was in operation before 6/21/90. (265.1057(h)(2))	DAE	[ ]		NI	N/A
c) Follow written plan that requires monitoring of valve at least once per calendar year. (265.1057(h)(3))	DAE	[ ]		NI	N/A
30. Valve designated for no detectable emissions, as indicated bt instrument reading of < 500 ppm above background, and described in 265.1064(g)(2) . If yes, the valve is exempt from monthly monitoring (#31) if: (265.1057(f))	DAE			NI	N/A
a) It has no external actuating mechanism in contact with the hazardous waste streams. (265.1057(f)(1))	DAE	[ ]		NI	N/A
b) It is operated with emissions < 500 ppm above background. (265.1057(f)(2))	DAE	[ ]		NI	N/A
c) It is tested for emissions initially and then annually. (265.1057(f)(3))	DAE	[ ]		NI	N/A
31. Is each valve, other than unsafe or difficult-to-monitor or no detectible emissions (#28-30), in gas/vapor or light liquid service monitored monthly for leaks? (265.1057(a)) (exemptions 33 & 34)	DAE	[ ]	✓	NI	N/A

OR

32. Any valve for which a leak has not been detected for two successive months may be monitored the first month of every succeeding quarter, until a leak is detected? (265.1057(c)(1))	DAE	[ ]		NI	N/A

AND

33. If the monitoring was every quarter and a leak is detected was the monthly monitoring resumed until a leak was not detected for 2 consecutive months? (265.1057(c)(2))	DAE	[ ]		NI	N/A
34. When a leak is detected, by an instrument reading of 10,000 ppm or greater: (265.1057(b)): (265.1057(d)(1))					
a) Was it repaired as soon as practicable but not later than 15 calendar days after detected? (265.1052(d)(1))	DAE	[ ]		NI	N/A
b) Was a first attempt at repair made no later than 5 calendar days after leak is detected? (265.1052(d)(2))	DAE	[ ]		NI	N/A
c) Was the first repair attempt include, but not limited to: (265.1057(e))					
I) Tightening of bonnet bolts?	DAE	[ ]		NI	N/A
ii) Replacement of bonnet bolts?	DAE	[ ]		NI	N/A
iii) Tightening of packing gland nuts?	DAE	[ ]		NI	N/A
iv) Injection of lubricant into lubricating packing?	DAE	[ ]		NI	N/A

STANDARDS: PUMPS AND VALVES IN HEAVY LIQUID SERVICE, PRESSURE RELIEF DEVICES IN LIGHT LIQUID OR HEAVY LIQUID SERVICE AND FLANGES AND OTHER CONNECTORS (40 CFR 265.1058)

NOTE: Delays in repair are allowed see 265.1059 (#37)

35. Are pumps and valves in heavy liquid service, pressure relief devices in light or heavy liquid service and flanges and other connectors monitored within 5 days if evidence of a potential leak is found by visual, audible, olfactory or other detection method? (265.1058)(a))	DAE	✓		NI	N/A
36. If a leak was detected, by an instrument reading of 10,000 ppm or greater: (265.1058(b))	DAE			NI	N/A
a) Was it repaired as soon as practicable but no later than 15 calendar days after detected? (265.1058(c)(1))	DAE	[ ]		NI	N/A
b) Was a first attempt at repair was made no later than 5 calendar days after leak is detected? (265.1058(c)(2))	DAE	[ ]		NI	N/A

		YES	NO	NI	N/A
c) Was the first repair attempt include, but not limited to: (265.1058(d))					
I) Tightening of bonnet bolts?	DAE	[ ]		NI	N/A
ii) Replacement of bonnet bolts?	DAE	[ ]		NI	N/A
iii) Tightening of packing gland nuts?	DAE	[ ]		NI	N/A
iv) Injection of lubricant into lubricating packing?	DAE	[ ]		NI	N/A

STANDARDS: DELAY OF REPAIR (40 CFR 265.1059)

37. Was there a delay in repair of equipment for which leaks have been detected? If yes, the delay is allowed if:	DAE		✓	NI	N/A
a) Was the repair technically infeasible without a shutdown of the hazardous waste management unit and did the repair occur before the end of the next shutdown? (265.1059(a))	DAE	[ ]		NI	N/A
b) Was the equipment isolated from the hazardous waste management unit and the unit does not contain or contact hazardous waste with organic concentrations at least 10% by weight. (265.1059(b))	DAE	[ ]		NI	N/A
38. Was there a delay in repair of a valve? If yes, the delay is allowed if:	DAE		✓	NI	N/A
a) Determine emissions from purged material from immediate repair are greater than emissions resulting from a delay of the repair. (265.1059(c)(1))		[ ]		NI	N/A
b) When repaired, the purged material is collected and destroyed or recovered in a control device. (265.1059(c)(2))	DAE	[ ]		NI	N/A
39. Was there a delay in repair of a pump? If yes, the delay will be allowed if:	DAE		✓	NI	N/A
a) Repair requires the use of a duel mechanical seal system that includes a barrier fluid system. (265.1059(d)(1))	DAE	[ ]		NI	N/A
b) Repair is completed as soon as practicable but within 6 months. (265.1059(d)(2))	DAE	[ ]		NI	N/A
40. Was there a delay in repair of a valve beyond a hazardous waste management unit shutdown? If yes, the delay will be allowed until the next shutdown or longer if the shutdown is within 6 months if: (265.1059(e))	DAE		✓	NI	N/A
a) The valve assembly replacement is necessary during shutdown.	DAE	[ ]		NI	N/A
b) Valve assembly supplies have been depleted & supplies were sufficiently stocked before supplies were depleted.	DAE	[ ]		NI	N/A

TEST METHODS AND PROCEDURES (40 CFR 265.1063)

41. Did the owner/operator subject to the provisions of this subpart comply with the required test methods and procedures: (265.1063(b-I))					
a) For leak detection monitoring? (265.1063(b))	DAE	[✓]		NI	N/A
b) For 'no detectible' emissions determination? (265.1063(c))	DAE	[ ]		NI	N/A
c) To determine if each piece of equipment contains or contacts a hazardous waste w/ organic concentrations ≥ 10% by weight? (265.1063(d))	DAE	[ ]	✓	NI	N/A
d) To determine if pumps or valves are in light liquid service? (265.1063(h))	DAE	[ ]	✓	NI	N/A
e) To determine if the control device achieved 95 weight percent organic emissions? (265.1063(I))	DAE	[ ]	✓	NI	N/A
42. Were samples used in determine the percent organic content representative of the highest TOC hazardous waste that is expected to be contained in or contact the equipment? (265.1063(g))	DAE	[✓]		NI	N/A

RECORDKEEPING REQUIREMENTS (40 CFR 265.1064)

Note: Owners/operators with more than one hazardous waste management unit, subject to these regulations, may use one recordkeeping system if each unit is identified.

Did the owners/operators record the following information in the operating record for each piece of equipment subject to Subpart BB? (265.1064(b))

		YES	NO	NI	N/A
a) Equipment identification number and hazardous waste management unit identification? (265.1064(b)(1)(I))	DAE	[ ]	✓	NI	N/A
b) Approx. location(s) of the equipment (e.g., identify unit on facility plot plan)? (265.1064(b)(1)(ii))	DAE	[ ]	✓	NI	N/A
c) Type of equipment (eg: pump or pipeline valve)? (265.1064(b)(1)(iii))	DAE	[ ]	✓	NI	N/A
d) Percent-by-weight total organics in the hazardous waste stream at the equipment? (265.1064(b)(1)(iv))	DAE	[ ]	✓	NI	N/A
e) State of the hazardous waste at the equipment (eg: liquid or gas/vapor)? (265.1064(b)(1)(v))	DAE	[ ]	✓	NI	N/A
f) Method of compliance w/ the standard (monthly leak detection/repair or equipped w/ dual mechanical seals?	DAE	[ ]	✓	NI	N/A
g) Implementation schedule, if facility can't install a closed-vent system & control device in time?(265.1064(b)(2))	DAE	[ ]	✓	NI	N/A
h) A performance test plan if the owner/operator chose to use test data to demonstrate the organic removal efficiency or total organic compound concentration by the control device? (265.1064(b)(3))	DAE	[ ]	✓	NI	N/A
I) Include documentation of compliance with the closed-vent and control device standards? (265.1064(b)(4))	DAE	[ ]	✓	NI	N/A
j) If a leak is detected?					
I) A weatherproof & readily visible identification attached to the leaking equipment and marked with: (265.1064(c)(1))					
a) The equipment i.d. number?	DAE	[ ]	✓	NI	N/A
b) Date evidence of a potential leak was found?	DAE	[ ]	✓	NI	N/A
c) Date leak was detected?	DAE	[ ]	✓	NI	N/A

Note: The identification on equipment, except a valve, may be removed after repair. (265.1064(c)(2)) *
Note: The identification on a valve may be removed after being monitored for two successive months without leaks. (265.1064(c)(3))

ii) In an inspection log the following information? (265.1064(d))					
a) Instrument, operator and equipment id number? (265.1064(d)(1))	DAE	[✓]		NI	N/A
b) Date evidence of a potential leak was found? (265.1064(d)(2))	DAE	[✓]		NI	N/A
c) Date leak was detected? (265.1064(d)(3))	DAE	[✓]		NI	N/A
d) Date of each attempt to repair the leak? (265.1064(d)(3))	DAE	[✓]		NI	N/A
e) Repair methods applied in each attempt to repair the leak? (265.1064(d)(4))	DAE	[✓]		NI	N/A
f) "Above 10,000" instrument readings? (265.1064(d)(5))	DAE	[✓]		NI	N/A
g) "Repair delayed" and the reason? (265.1064(d)(6))	DAE	[✓]		NI	N/A
h) Documentation supporting delay in valve repair? (265.1064(d)(7))	DAE	[✓]		NI	N/A
I) Signature of owner/operator whose decision it was not to repair until shutdown? (265.1064(d)(8))	DAE	[ ]		NI	N/A
j) If the repair is not done in 15 days the expected date of a successful repair? (265.1064(d)(9))	DAE	[ ]		NI	N/A
k) The date of successful repair of the leak? (265.1064(d)(10)	DAE	[ ]		NI	N/A
iii) Up-to-date design documentation, monitoring, operating, inspection information for closed-vent & control devices? (265.1064(e))	DAE	[ ]	✓	NI	N/A
iv) Control device (other than thermal or catalytic vapor incinerator/flare/boiler/process heater/condenser/carbon adsorption system) have monitoring/inspection information indicating proper operation/maintenance of control device? (265.1064(f))	DAE	[ ]	✓	NI	N/A
v) The following information regarding the equipment recorded in a log: (265.1064(g))					
a) List of identification numbers for the equipment subject to the requirements and equipment designated for no detectable emissions? (265.164(g)(1)&(2)(I))	DAE	[ ]		NI	N/A
b) The designation of the equipment signed by the owner/operator? (265.1064(g)(2)(ii))	DAE	[ ]		NI	N/A
c) List of identification numbers for pressure relief devices? (265.1064(g)(3))	DAE	[ ]	✓	NI	N/A
d) For each compliance test:					

* not all equipment subject to BB identified.

		YES	NO	NI	N/A
1) Dates of each test? (265.1064(g)(4)(I))	DAE	[ ]		NI	N/A
2) Background level measured during each test? (265.1064(g)(4)(ii))	DAE	[ ]		NI	N/A
3) The maximum instrument reading measured at the equipment during each test? (265.1064(g)(4)(iii))	DAE	[ ]		NI	N/A
e) List of all identification numbers for equipment in vacuum service? (265.1064(g)(5))	DAE	[ ]		NI	N/A
vi) A log with a list of identification numbers for the valves that are designated unsafe or difficult to monitor, an explanation stating why they are unsafe or difficult and the plan for monitoring? (265.1064(h)(1-2))	DAE	[ ]		NI	N/A
vii) For valves in gas/vapor or light liquid service with alternative standards the operating record will record: (265.1064(I))					
a) A schedule of monitoring? (265.1064(I)(1))	DAE	[ ]		NI	N/A
b) The percent of valves found leaking during each monitoring period? (265.1064(I)(2))	DAE	[ ]		NI	N/A
viii) Is the following information shall be recorded in a log and kept in the operating record: (265.1064(j))					
a) Criteria for failure of seal system indicated by sensor used w/ light liquid service pumps? (265.1064(j)(1))	DAE	[ ]		NI	N/A
b) Criteria for failure of seal system indicated by sensor used w/ compressors? (265.1064(j)(1))	DAE	[ ]		NI	N/A
c) Any changes to these criteria and the reason for change? (265.1064(j)(2))	DAE	[ ]		NI	N/A
ix) The following information kept in a log and used to determine exemptions for the hazardous waste management unit: (265.1064(k))					
a) An analysis determining the design capacity of the management unit? (265.1064(k))	DAE	[ ]		NI	N/A
b) A statement listing the hazardous waste influent to and effluent from each unit and analysis determining whether the waste is a heavy liquid? (265.1064(k)(2))	DAE	[ ]		NI	N/A
c) Up-to-date analysis/supporting data used to determine if equipment is subject to standards? (265.1064(k)(3))	DAE	[ ]		NI	N/A
d) Documentation when knowledge of the hazardous waste stream or process is used? (265.1064(k)(3))	DAE	[ ]		NI	N/A
e) Any new determinations if the owner/operator takes any action that could result in an increase of the organic content of the waste? (265.1064(k)(3))	DAE	[ ]		NI	N/A
43. Are records of equipment leak information in 265.1064(d) and closed-vent and control device information in 265.1064(e) kept 3 years? (265.1064(1))	DAE	[✓]		NI	N/A

Comments: _____

INTERIM STATUS FACILITIES ORGANIC AIR EMISSION STANDARDS FOR PROCESS VENTS

Facility's Name Hukill Chemical Corp.

Date May 17, 2006 ID# OHD 001 926 740

: Use of the words "process vents" means process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction or air or steam stripping operations managing hazardous waste with organic concentrations of at least 10 ppmw (time weight annual average basis).

Note: Total Organic Emissions shall be abbreviated to TOE

(rev. 7/3/96 - EAB-MDEQ)

NI - not inspected **N/A - not applicable**

YES	NO	NI	N/A

APPLICABILITY (40 CFR 265.1030)

1. Manage hazardous waste w/ organic concentrations of at least 10 ppmw in units w/ process vents? (265.1030(b))	DAE	Yes *

IF YES

a) Are the units subject to the permitting requirements under part 270? (265.1030(b)(1))	DAE	*

OR

b) Are there hazardous waste recycling units with process vents that are located at the facility that is otherwise subject to the permitting requirements? (265.1030(b)(2))	DAE	Yes *

* If the answers to the above questions is no the following regulations do not apply, except you must verify the facility waste has less than 10 ppmw: see 40 CFR 265.1034(d) and 40 CFR 265.1034(e) and this information must be recorded in a log: 40 CFR 265.1035(f).

STANDARDS: PROCESS VENTS (40 CFR 265.1032)

Note: A determination of vent emissions may be based on engineering calculations or tests (265.1032(c)) with any performance tests meeting the requirements of 265.1034(c).

2. Has the owner/operator of a facility with process vents:			
a) Reduced TOE from all affected process vents < 1.4 kg/h (3 lb/h) & 2.8 mg/yr (3.1 tons/yr)? (265.1032(a)(1))	DAE	[✓]	NI N/A

OR

b) Reduced, by use of a control device (that meets the requirements of 265.1033) the TOE from all affected process vents by 95 weight percent? (265.1032(a)(2))	DAE	[ ]	NI N/A

Note: If the process vents emit below the limits with out an add-on control device the facility the only additional requirement is 265.1035(f)

STANDARDS: CLOSED-VENT SYSTEMS AND CONTROL DEVICES (40 CFR 265.1033)

3. Was a closed-vent system and control device installed by 12/21/90 or as per an implementation schedule with a completion date as soon as possible but no later than June 21, 1992? (265.1033(a)(2))	DAE	[ ]	NI N/A
4. If the owner/operator has installed a closed-vent system and control device by their effective date, was: (265.1033(a)(1))			
a) Control device involving vapor recovery designed/operated to recover organic vapors vented to it w/ an efficiency of 95 weight percent or greater? (265.1033(b)) (N/A if TOE for all affected process vents can be attained at an efficiency less than 95 weight percent?)	DAE	[ ]	NI N/A
b) Enclosed combustion device designed and operated to reduce organic emissions vented to it by 95 weight percent or greater to: (265.1033(c))			
I) Achieve a total organic compound concentration of 20 ppmv?	DAE	[ ]	NI N/A

OR

ii) Provide minimum resident time of 0.50 seconds at minimum temp. of 760 degrees C? (265.1033(c))	DAE	[ ]	NI N/A
c) A flare:			
I) Designed/operated w/ no visible emissions except periods not to exceed total of 5 minutes during any 2 consecutive hours? (255.1033(d)(1))	DAE	[ ]	NI N/A
ii) Operated with a flame present at all times? (265.1033(d)(2))	DAE	[ ]	NI N/A

		YES NO NI N/A
iii) Used only if: (265.1033(d)(3))		
a) Net heating value of gas being combusted is ≥ 300 Btu/scf if flare is steam or air assisted?	DAE	[ ] NI N/A

OR

b) If the net heating value of the gas being combusted is 200 Btu/scf. or greater if the flare is non-assisted?	DAE	[ ] NI N/A
d) Was the steam-assisted or non-assisted flare designed and operated with an exit velocity: (265.1033(d)(4)(I-iii))		
I) Less than 60 ft/s? Except if,	DAE	[ ] NI N/A
ii) ≥ 60 ft/s but < 400 ft/s? (Only allowed if net heating value of gas is greater than 1000 Btu/scf)	DAE	[ ] NI N/A
iii) Less than the velocity, Vmax and less than 400 ft/s?	DAE	[ ] NI N/A
e) Was air-assisted flare designed and operated with an exit velocity less than the velocity Vmax? (265.1033(d)(5))	DAE	[ ] NI N/A

Note: The formulas needed to determine #4.d & #4.e. are found in 265.1033(e)(2-5).

f) For a flare was:		
I) Method 22 used to determine compliance with visible emissions? (265.1033(e)(1))	DAE	co rep. said [ ] NI N/A
ii) The net heating value of the gas being combusted calculated correctly? (265.1033(e)(2))	DAE	co rep. said [ ] NI N/A
iii) The actual exit velocity correctly determined? (265.1033(e)(3))	DAE	co rep. said [ ] NI N/A
iv) The maximum allowed velocity calculated correctly? (265.1033(e)(4))	DAE	co rep. said [ ] NI N/A
v) The maximum allowed velocity for air assisted flare calculated correctly? (265.1033(e)(5))	DAE	co rep. said [ ] NI N/A
5. Did the owner/operator monitor and inspect each control device required to ensure proper operation and maintenance by: (265.1033(f)(1))		
a) Installing/calibrating/maintaining/operating flow indicator w/ record of vent stream flow at least once per hour?	DAE	[ ] NI N/A
b) Installing/calibrating/maintaining/operating device to continuously monitor control devices as specified below: (265.1033(f)(2))		
I) Thermal vapor incinerator, a temperature monitoring device equipped with a continuous recorder?	DAE	[ ] NI N/A
ii) Catalytic vapor incinerator, a temperature monitoring device equipped with a continuous recorder?	DAE	[ ] NI N/A
iii) Flare/heat sensing monitoring device have a continuous recorder giving continuous ignition pilot flame?	DAE	[ ] NI N/A
iv) Boiler/process heater w/ design heat input capacity <44MW, a temp. monitoring device w/ a continuous recorder?	DAE	[ ] NI N/A
v) Boiler/process heater w/ design heat input capacity ≥44MW, a monitoring device w/ a continuous recorder to measure parameter(s) that indicates good combustion operating practices?	DAE	[ ] NI N/A
vi) For a condenser, either: (265.1033(f)(2)(vi))		
a) Monitoring device w/ continuous recorder for concentration of organic compounds in exhaust vent stream?	DAE	[ ] NI N/A

OR

b) A temperature monitor device equipped with continuous recorder?	DAE	[ ] NI N/A
vii) A carbon adsorption system that regenerates the carbon bed directly in the control device, either: (265.1033(f)(2)(vi))		
a) Monitoring device w/ continuous recorder for concentration of organic compounds in exhaust vent stream?	DAE	[ ] NI N/A

OR

		YES	NO	NI	N/A
b) Monitor device w/ continuous recorder to measure parameter that indicates the carbon bed is regenerated on a regular predetermined time cycle?	DAE	[ ]		NI	N/A

AND

c) Replaces existing carbon w/ fresh at pre-set interval no longer than carbon service life? (265.1033(g))	DAE	[ ]		NI	N/A
viii) If using a carbon adsorption system that does not regenerate carbon bed on-site in the control device, the existing carbon will be replaced w/ fresh carbon on a regular basis by either: (265.1033(h)(1-2))					
a) Monitoring the concentration level of the organic compounds regularly and replace the carbon with fresh immediately after break-through?					
I) Monitoring daily?	DAE	[ ]		NI	N/A
ii) Monitoring at interval no greater than 20% of time required to consume total carbon working capacity?	DAE	[ ]		NI	N/A
b) Replace the existing carbon with fresh at regular, predetermined intervals?	DAE	[ ]		NI	N/A
c) Inspecting readings from (except 265.1033(h)) monitoring device(s) at least once each operating day? (265.1033(f)(3))	DAE	[ ]		NI	N/A

AND

d) If needed, implement necessary corrective measures to ensure control devices work? (265.1033(f)(3))	DAE	[ ]		NI	N/A

Note: An alternative operational or process parameter may be monitored see 40 CFR 265.1033(I).

6. The closed-vent system(s):					
a) Was it designed for and operated with no visible emissions? (265.1033(j)(1))	DAE	[ ]		NI	N/A
b) Have initial leak detection monitoring conducted: (265.1033(j)(2))					
I) By date facility becomes subject to these regulations?	DAE	[ ]		NI	N/A
ii) Annually thereafter?	DAE	[ ]		NI	N/A
c) Control detectable emissions (>500 ppm) as soon as possible but: (265.1033(j)(3-4))					
I) No later than 15 calendar days after detected?	DAE	[ ]		NI	N/A
ii) First attempt at repair made no later than 5 calendar days after detection?	DAE	[ ]		NI	N/A
7. Were closed-vent systems and control devices operated at all times when emissions may be vented to them? (265.1033(k))	DAE	[ ]	co. rep said	NI	N/A

TEST METHODS AND PROCEDURE (40 CFR 265.1034)

8. Were correct test methods and procedures used? (265.1034(a))					
a) For a closed-vent system tested for no detectable emissions? (265.1034(b)(1-7))	DAE	[ ]		NI	N/A
b) To determine compliance with the 10 ppmw and with the total organic compound limit (95%)? (265.1034(c))	DAE	[ ]		NI	N/A
9. Did the facility determine that the process vents are not subject to the requirements of this subpart? If so, did the owner/operator make an initial determination that the time-weighted annual average total organic concentration managed by the unit is less than 10 ppmw by: (265.1034(d))					
a) Direct measurement? (265.1034(d)(1))	DAE	[ ]		NI	N/A
b) Using knowledge? (265.1034(d)(2))	DAE	[ ]		NI	N/A
10. Was the determination that distillation, fractionation, thin-film evaporation, solvent extraction or air or stream stripping operations manage hazardous wastes time-weighted annual average total organic concentration is less than 10 ppmw made as follows: (265.1034(e))					
a) By date the facility is first subject to the regulations or the date the waste is first managed, whichever is first?	DAE	[ ]		NI	N/A
b) For continuously generated waste annually?	DAE	[ ]		NI	N/A

	YES	NO	NI	N/A
OR				
c) When there is change in way waste being managed or in the process that generates the waste? (265.1034(e)(3)) DAE		[ ]	NI	N/A

RECORDKEEPING REQUIREMENTS (40 CFR 265.1035)

Note: If there is more than one managed unit the facility can use one recordkeeping system. (265.111035(a)(2))

11. Did the owner/operator record the following information in the facility operating record: (265.1035(b))			
a) The schedule and the rational, if the facility needed to develop an implementation schedule? (265.1035(b)(1)) DAE	[ ]	NI	N/A
b) Up-to-date process vent documentation?			
I) Information & data: (265.1035(b)(2)(I))			
a) Identifying all effected process vents? DAE	[ ]	NI	N/A
b) Annual throughput and operating hours of each effected unit? DAE	[ ]	NI	N/A
c) Estimated emission rates for each effected vent & for overall facility? DAE	[ ]	NI	N/A
d) Location of each effected vent on plot plan? DAE	[ ]	NI	N/A
ii) Information and data supporting determinations of vent emissions and emission reductions achieved by add-on control devices based on engineering calculations or source tests? (265.1035(b)(2)(ii)) DAE	[ ]	NI	N/A
c) If tests were used to determine organic removal efficiency or total organic compound concentration was there a performance test plan, which include: (265.1035(b)(3)(ii)(A-E))			
I) Engineering description of closed vent system and control device including:			
a) Manufacture name and model #? DAE	[ ]	NI	N/A
b) Type of control device? DAE	[ ]	NI	N/A
c) Dimensions? DAE	[ ]	NI	N/A
d) Capacity? DAE	[ ]	NI	N/A
e) Construction materials? DAE	[ ]	NI	N/A
ii) Description of sampling and monitoring procedures, including: (265.1035(b)(3)(iii))			
a) Location? DAE	[ ]	NI	N/A
b) Equipment? DAE	[ ]	NI	N/A
c) Frequency? DAE	[ ]	NI	N/A
d) Procedures? DAE	[ ]	NI	N/A
d) Documentation on the closed-vent systems and the control devices required in 265.1033, specifically: (265.1035(b)(4))			
I) List of all information, references and sources used to prepare documentation? (265.1035(b)(4)(I)) DAE	[ ]	NI	N/A
ii) Records with dates of compliance tests? DAE	[ ]	NI	N/A
iii) Engineering calculations for design analysis/specifications/drawings/schematics/piping/instrument diagrams include: (265.1035(b)(4)(iii))			
a) Thermal vapor incinerators, consider vent stream composition/constituent composition/flow rate. Included design minimum, average temperature & residence time in the combustion zone? (265.1035(b)(4)(iii)(A)) DAE	[ ]	NI	N/A
b) Catalytic vapor incinerators, consider vent stream composition/constituent composition/flow rate. Include design minimum & average temperature across the catalyst bed inlet and outlet? (265.1035(b)(4)(iii)(B)) DAE	[ ]	NI	N/A
c) Boiler or process heater, consider vent stream composition/constituent composition/flow rate. Include design minimum & average flame zone temperatures, combustion zone residence time & where vent system is introduced? (265.1035(b)(4)(iii)(C)) DAE	[ ]	NI	N/A
d) Flare, consider vent stream composition/constituent composition/flow rate. Design analysis requirements are in 265.1033(d)? (265.1035(b)(4)(iii)(D)) DAE	[ ]	NI	N/A

		YES	NO	NI	N/A
e) Condenser, consider vent stream composition/constituent composition/flow rate/relative humidity & temp. Include design outlet organic compound concentration level, design average temp. of the exhaust vent stream, and the design average temp. of the coolant fluid at the condenser outlet and inlet? (265.1035(b)(4)(iii)(E))	DAE	[ ]		NI	N/A
f) Carbon adsorption system that regenerates bed on-site in the control device, consider the vent stream composition/constituent concentrations/flow rate/relative humidity/temperature. Include design exhaust vent stream organic compound concentration level/number & capacity of carbon beds/type & capacity of activated carbon/total stream flow/bed steaming/cooling/drying cycles/temp. regeneration/time of regeneration/service life? (265.1035(b)(4)(iii)(F))	DAE	[ ]		NI	N/A
g) Carbon adsorption system that does not regenerate on-site in a control device, consider the vent stream composition/constituent concentrations/flow rate/relative humidity/temperature. Include the design outlet organic concentration level/capacity of the bed/type & capacity of the carbon in the bed/replacement interval? (265.1035(b)(4)(iii)(G))	DAE	[ ]		NI	N/A
e) A statement signed/dated by the owner/operator certifying that the operating parameters used in the design analysis reasonably represent the conditions that exist when the hazardous waste management unit is or would be operating at the highest load or capacity level reasonably expected to occur? (265.1035(b)(iv))	DAE	[ ]		NI	N/A
f) A statement signed/dated by the owner/operator certifying that the control device is designed to operate at an efficiency of $\geq$ 95% (are alternatives)? A statement from the device manufacture or vendor certifying that the control equipment meets the design specifications will suffice? (265.1035(b)(v))	DAE	[ ]		NI	N/A
g) If test performance tests are used to demonstrate compliance, all test results? (265.1035(b)(vi))	DAE	[ ]		NI	N/A
h) Design documentation & monitoring/operating & inspection information for each closed-vent system/control device recorded, kept up-to-date and including: (265.1035(c))					
I) Description and date of each modification? (265.1035(c)(1))	DAE	[ ]		NI	N/A
ii) Id operating parameters/describe monitoring devices/diagram monitoring sensor locations? (265.1035(c)(2))	DAE	[ ]		NI	N/A
iii) Monitoring/operating & inspection information required in 265.1033(f-j)? (265.1035(c)(3))	DAE	[ ]		NI	N/A
iv) Date, time and duration when monitoring values exceed the value established? (254.1035(c)(4))	DAE	[ ]		NI	N/A
v) Explanation for each period the control device operating parameter exceeded the design value & the measures implemented to correct the control device? 265.1035(c)(5))	DAE	[ ]		NI	N/A
vi) Carbon adsorption systems where the carbon is regenerated in the control device or a system that changes the carbon at a regular, predetermined interval give the date when existing carbon is replaced? (265.1035(c)(6))	DAE	[ ]		NI	N/A
vii) For a carbon adsorption system that changes the carbon at breakthrough have a log that records: (265.1035(c)(7)(I-ii))					
a) Date and time of breakthrough and the monitoring device reading?	DAE	[ ]		NI	N/A
b) Date when existing carbon is replaced with fresh carbon?	DAE	[ ]		NI	N/A
viii) Date of control device start up and shut down? (265.1035(c)(8))	DAE	[ ]		NI	N/A
I) Control device other than thermal or catalytic vapor incinerator/flare/boiler/process heater/condenser/carbon adsorption bed, the monitoring/inspection information indicating proper operation & maintenance? (265.1035(e))	DAE	[ ]		NI	N/A
j) Up-to-date information/data used to determine if a process vent falls under (265.1032) & supporting documentation (265.1034(d)(2)) when knowledge of the nature of hazardous waste stream or process is used? (265.1035(f))	DAE	[ ]		NI	N/A
12. Are records of monitoring, operating and inspection information kept at least 3 years? (265.1035(d))	DAE	[ ]		NI	N/A

Hukill Chemical May 17, 2006 OHD 001 926 740

Inspection Checklist for Subpart CC: Air Emission Standards (Containers)

Item # 40 CFR:

CC-1	265. 1080	Do any of the following exclusions apply? If yes, please circle.	YES	NO

Applicability: The air emission requirements apply to units subject to subpart I * unless the following apply (circle if applicable):

1. Waste was placed in unit prior to Oct. 6, 1996, and none has been added since.
2. The container capacity is less than .1 cubic meter (26 gallons)
3. A unit (e.g. tank) has stopped adding waste and is undergoing closure
4. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program
5. The unit is used solely to manage radioactive mixed waste
6. The unit is regulated by and operates in accordance with Clean Air Act regulations

***Note: 1. Satellite containers are exempt 2. CESQG's and SQG's are exempt**

CC-2	265.1083	Do any of the following exemptions apply? If yes, please circle	YES	NO

General Standards: The owner/operator must control air emissions from waste management units except the unit is exempt if (please circle if applicable):

1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required)
2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable destruction or removal processes.
3. The unit is a tank used for certain biological treatment
4. The hazardous waste placed in the unit meets the LDR numerical concentration limits or has been treated using the specified LDR treatment technology (for organics)
5. The unit is a tank used for bulk feed to an incinerator and meets certain requirements

CC-3	265.1084	Waste Determination:	Determination Not Needed	Determination Needed

Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is not needed for waste managed in containers which meet standards. It may be necessary to evaluate container management prior to requiring VO concentration determination.

#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency	NA	NI	OK	DF

CONTAINER MANAGEMENT 265.1087

	Level 1	Level 2	Level 3
	Larger than 26.4 gallons and less than or equal to 122 gallons, or larger than 122 gallons and do not manage H.W. in light material service	Larger than 122 gallons and manage H.W. "in light material service" (definition at 265.1081)	Larger than 26.4 gallons and treat H.W. by a stabilization process
CC-4 / 265.1087	Controls		
	One of the following: -Use containers that meet DOT requirements -Use a cover and control with no visible gaps, holes or other open spaces into the interior of the container -Use organic vapor suppression on or above the container 265.1087(c)	One of the following: -Use containers that meet DOT requirements -Use containers that operate with no detectable emissions (method 21) -Use containers that are demonstrated to be vapor-tight within the last 12 months (method 27) 265.1087(d) Blow over tote open	-Containers used to stabilize H.W. with volatile organics greater than 500 ppm -For waste stabilized in a container either: 1.container must be vented directly to a control device; or 2.container is vented inside an enclosure which is exhausted through a closed vent to a control device -Conservation vents are not allowed 265.1087(b)(2)

Level 1		Level 2	Level 3		
#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency		NA	NI	OK
CC -5	265.1087	Waste transfer requirements			
No waste transfer requirements apply		-Waste transfer requirements apply regardless of container alternative used in level 2 -Transfer waste into or out of a container in such a manner as to minimize exposure of the waste to the atmosphere. Acceptable methods include a submerged fill pipe, vapor recovery system, or fitted opening with a line purge 265.1087(b)(3)	Not applicable		
CC-6	265.1087	Operating requirements			
The covers, openings, and closure devices should be closed except: 1. When transferring H.W. in and out of the containers 2. between batch transfer not exceeding 15 minutes between transfer (note: if the person performing the transfer leaves the area, or the process shuts down, the container must be closed) 3. While performing sampling and equipment access 4. Conservation and safety vents are allowed -Containers may be open while performing sampling or equipment access -Safety valves and conservation vents may be used if normally left in close position -A cover need not to be on a RCRA empty container, as defined in 40 CFR 261.7 265.1087(c)(3), (d)(3) Open tote			-If the vapors are directly vented to a control device, there are specific design and operating criteria that must be met same as tanks that have closed vent and control device systems -If an enclosure is used, the enclosure must meet the design and operating criteria specified in "Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741 The container, enclosure, control device or closed vent system may have safety relief devices.		
CC-7	265.1089	Inspection requirements			✓
Minimal inspection required: - when facility accepts container and it is not emptied within 24 hours -if wastes are stored greater than a year, then visually inspect once a year If inspections are required, facility must develop written plan and schedule to perform inspection 265.1087(c)(4), (d)(4)			Inspection requirements are the same as for tanks		
CC- 8	265.1087	Repair requirements			✓
When a defect is detected; attempt to repair within 24 hours must be made and: 1. Repair within 5 calendar days or empty and remove the container from service 2. Do not use until defect is repaired 265.1087(c)(4), (d)(4)			Necessary corrective measures shall be immediately implemented to ensure that the control device is operated in compliance		
CC- 9	265.1090	Recordkeeping requirements			✓
-If container exceeds 122 gallons and does not meet DOT standards, records indicating that the container is not managing H.W. in light material service		Since Level 2 waste is "in light material service", no records need to be kept	Depends upon how the organic emissions are vented: -If an enclosure is used, records must be maintained for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent total enclosure (Procedure T) -Records for the closed vent and control device system are the same for those used on tanks(265.1090)(e)		

Comments:

Inspection Checklist for Subpart CC: Air Emission Standards (Tanks)

Applicability: The air emission requirements apply to units subject to Subpart J * unless any of the following apply:

Item # 40 CFR: *Note: CESQG's and SQG's are exempt

CC-T1	**265. 1**	**Do any of the following general exclusions apply? If yes, please circle.**	**YES**	**NO**

1. Wastewater treatment units -265.1(c)(10)
2. Emergency spill management units. -265.1(c)(11)
3. Hazardous waste recycling units. -265.1(c)(6)
4. Elementary neutralization units -265.1(c)(10)
5. Totally enclosed treatment units. -265.1(c)(9)
6. Satellite accumulation areas. -265.1(c)(7) - 262.34(c)(1)

CC-T2	**265.1080**	**Do any of the following exceptions apply? If yes, please circle.**	**YES**	**NO**

1. Waste was placed in the unit prior to Oct. 6, 1996 and none has been added since. -265.1080(b)(1)
2. The unit has stopped adding waste and is undergoing closure pursuant to an approved closure plan. -265.1080(b)(3)
3. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program. -265.1080(b)(5)
4. The unit is used solely to manage radioactive mixed waste. -265.1080(b)(6)
5. The unit operates with an emission control device regulated by and in accordance with Clean Air Act regulations. -(b)(7)
6. The unit operates with a process vent as defined in 264.1031, regulated under Subpart AA. -265.1080(b)(8)

CC-T3	**265.1080(d)**	**Administrative Stay for Organic Peroxide Waste:**	**YES**	**NO**

If the unit recieves hazardous waste generated by organic peroxide manufacture, and the owner/operator has met the conditions as set forth in 265.1080(d), the requirements under Subpart CC are administratively stayed, *except for the record keeping requirements* which additionally include the notification requirement as given in 265.1080(d)(3).

CC-T4	**265.1083**	**Do any of the following exemptions apply? If yes, please circle.**	**YES**	**NO**

General Standards: The owner/operator must control air emissions from waste management units except the unit is exempt if:

1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required by 265.1084; see **CC-T5**). -265.1083(c)(1)
2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable processes. -265.1083(c)(2)
3. The unit is a tank used for certain biological treatment consistent with 265.1087(c)(2)(iv). -265.1083(c)(3)
4. The hazardous waste placed in the unit meets the LDR numerical concentration limits given in 268.40 or has been treated using the LDR treatment technology specific for the waste (specified in 268.42). -265.1083(c)(4)
5. The unit is a tank within an enclosure used for bulk feed to an incinerator and meets certain requirements. -265.1083(c)(5)

CC-T5	**265.1084**	**Waste Determination**	**Determination Not Needed**	**Determination Needed**

Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is **not** needed for waste managed in tanks which meet Subpart CC standards. It may be necessary to evaluate tank management prior to requiring VO concentration determination.

TANK MANAGEMENT

Level 1 tank controls apply only to a fixed-roof tank in which the maximum vapor pressure of organic waste is less than that listed below for each tank design capacity, contents are not heated above the temperature of vapor pressure determination, and no v[illegible] stabilization is conducted in the tank. -265.1085(b)(1)
Tanks that exceed Level 1 criteria must use Level 2 controls; tanks that do not exceed Level 1 criteria may use Level 2 contro[illegible] ne five design options for Level 2 controls are given below; vented fixed-roof tanks are the most common. -265.1085(b)(2)

Tank Design Capacity	Level 1 pressure limits	Level 1	Level 2
≥ 151m³ / 40,000 gal	< 5.2 kPa / 0.75 psi	Fixed-roof tanks -265.1085(c)(1) through (c)(4) -265.1085(d)	Fixed-roof tanks vented to control device -265.1085(g) External floating roof tanks - 265.1085(f) Fixed-roof with internal floating roof - 265.1085(e) Enclosure vented to combustion device - 265.1085(i) Pressure tank - 265.1085(h)
< 151 m³ and ≥ 75 m³	< 27.6 kPa / 4.0 psi		
< 75 m³ / 20,000 gal	< 76.6 kPa / 11.1 psi		

265.1085(c) Level 1 Controls for Fixed-Roof Tanks

NA=Not Applicable NI=Not Inspected OK= In Compliance DF= Deficiency

CC-T6	265.1085(c)(1)	Vapor Pressure Determination	NA	NI	OK	DF

Has the owner/operator determined the maximum organic vapor pressure of the waste in the tank: -265.1085(c)(1) by direct measurement or by knowledge? -265.1084(c)(3,4)	YES	NO
Is the determination acceptable?	YES	NO
Does waste in tank exceed vapor pressure threshold for tank size? (If yes must use Level 2 Controls)	YES	NO

CC-T7	265.1085(c)(2)	Tank Design Specifications	NA	NI	OK	DF

The fixed roof and its closure devices shall be designed to form a continuous barrier over the entire surface area of the hazardous waste in the tank; shall be installed such that ther are no visible cracks, holes, gaps or other open spaces between roof and tank wall / closure device and roof.
Inspect the fixed roof and closure devices of each tank or a representative percentage of multiple tanks; list and photograph defects at each.

Tank #	Defect(s)	Photo #	Notes

Is each opening in the fixed roof (sampling port, conservation vent, level indicator, safety valve, etc.): 265.1085(c)(2)(i)(A) equipped with a closure device such that when closed there are no visible cracks, holes, gaps or other open spaces? or;	YES	NO
265.1085(c)(2)(i)(B) connected via a closed vent system to a control device? (If YES see Level 2 Controls checklist below)	YES	NO

CC -T8	265.1085(j)	Waste transfer requirements	NA	NI	OK	DF

Transfer of hazardous waste to the tank from another tank subject to 265.1085 or suface impoundment subject to 265.1086 shall be conducted using continuous hard piping or other closed system,to prevent exposure of waste to atmosphere; except under conditions given in 265.1085(j)(2).

CC-T9	265.1085(c)(3)	Operating requirements	NA	NI	OK	DF

Cover and closure devices shall be closed at all times except when performing routine inspections, sampling, maintenance and cleaning.
Opening of a pressure/vacuum relief valve, conservation vent or similar device is allowed during normal operations to maintain tank pressure within design specificatons. Opening of a safety device is allowed at any time.

Are pressure/vacuum relief valves and conservation vents designed to operate with NDE when secured in closed position?	YES	NO
Are the opening settings of these devices consistent with the manufacturer's recommended operating ranges?	YES	NO
What are the pressure settings of these devices and how do they compare with Level 1 vapor pressure limits?	OK	DF

CC-T10	265.1085(c)(4)	**Inspection requirements**	NA	NI	OK	DF

The fixed roof and closure devices shall be visually inspected for defects initially, on or before December 12, 1996, or when first in service and thereafter at least annually,according to written plan; except when unsafe, and delay conditions are met. Buried parts of tank need not be inspected
TSDs: The inspection plans must be incorporated into the overall facility inspection plan as per 265.15.

CC-T11	265.1085(k)	**Repair requirements**	NA	NI	OK	DF

Owner/operator shall make first efforts at repair of each defect detected during an inspection no later than 5 calendar days after detection; repairs shall be completed as soon as possible but no later than 45 calendar days after detection, except as provided in 265.1085(k)(2).

CC- T12	265.1090(b)	**Recordkeeping requirements**	NA	NI	OK	DF

For each unit in service records must be maintained on-site including: unique unit ID number, dimensions and capacity, organic vapor pressure of waste (if tested, records include time and date of samples, analytical method, and results), and inspection and repair records for three years.
Please list in detail below deficiencies noted regarding items CC-T6 through CC-T12:

CC- T13	265.1085(c)(2)	**Level 2 Controls for Fixed-Roof Tanks Vented to Control Device**	**NA=Not Applicable OK= In Compliance**	**NI=Not Inspected DF= Deficiency**

All requirements of CC-T7 and: Each roof opening not equipped with a closure device shall be connected to a closed system that is vented to a control device which removes or destroys organics in the vent stream, and which shall be operating whenever hazardous waste is in the tank.

CC- T14	265.1085(j)	**Waste transfer requirements**	NA	NI	OK	DF

All requirements of CC-T8.

CC- T15	265.1085(g)	**Operating requirements**	NA	NI	OK	DF

All requirements of CC-T9 and: Closed vent system and control device shall be installed and operated in accordance with 265.1088.

CC- T16	265.1085(g)(3)	**Inspection requirements**	NA	NI	OK	DF

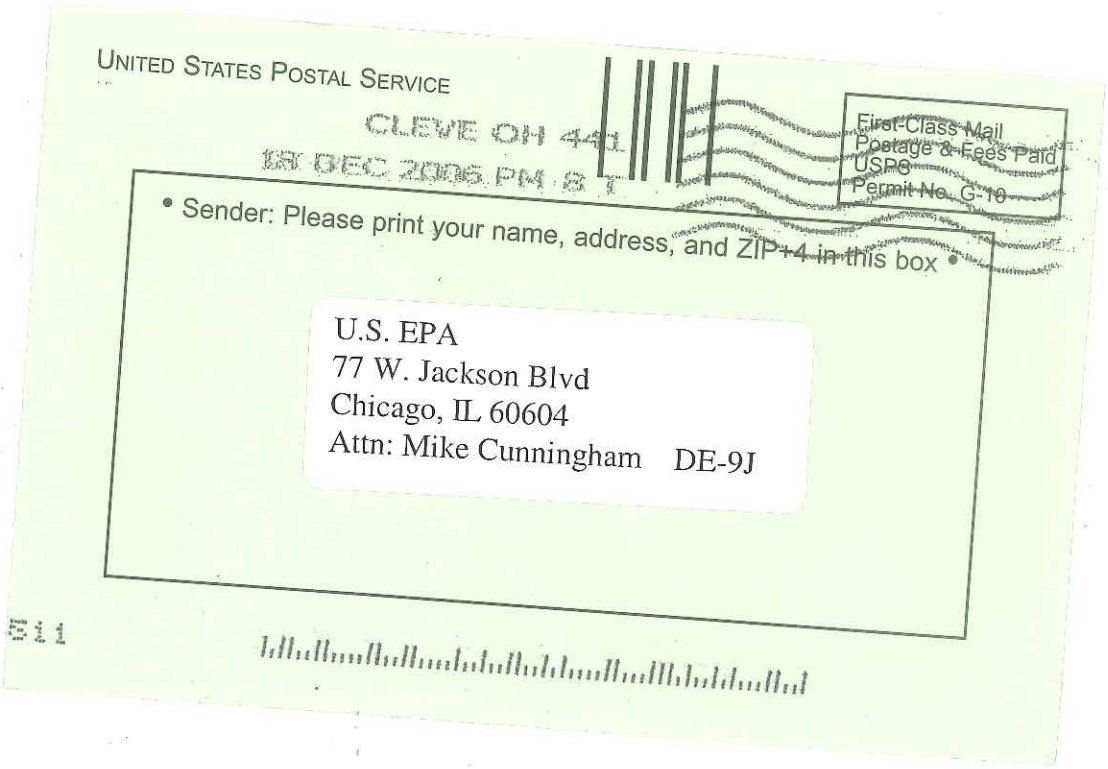
All requirements of CC-T10 and: perform initial leak detection testing of closed vent system on or before date tank is subject to the rule, as per 265.1088(b)(4); annually inspect closed vent system components per 265.1033(k) and 265.1034(b); negative pressure systems per 265.1033(j)(2).

CC- T17	265.1085(k)	**Repair requirements**	NA	NI	OK	DF

All requirements of CC-T11.

CC- T18	265.1090(e)	**Recordkeeping requirements**	NA	NI	OK	DF

All requirements of CC-T12 and: maintain records of unexpected malfunctions and semiannual updates of planned maintenance operations for 3 years; also: If control device is <u>not</u> a carbon absorber, condenser, flare, process heater, boiler or thermal vapor incinerator, maintain records of proper operation and use (e.g., manufacturer's documentation). Please list in detail below deficiencies regarding items CC-T13 through CC-T18:


UNITED STATES POSTAL SERVICE
CLEVE OH 441
DEC 2006 PM 3 T
First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10
• Sender: Please print your name, address, and ZIP+4 in this box •
U.S. EPA
77 W. Jackson Blvd
Chicago, IL 60604
Attn: Mike Cunningham DE-9J
E11

SENDER: *COMPLETE THIS SECTION*

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Vince Valentino
VP, General Manager
Hukill Chemical Corporation
7013 Knick Road
Bedford, OH 44146

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* | B. Date of Delivery

C. Signature

X Phyllis Kukla ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number
(Transfer from service label) 7001 0320 0005 9025 5070

PS Form 3811, March 2001 Domestic Return Receipt 102595-01-M-1424

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

DE-9J

AUG 29 2005

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Marian M. (Heffner) Gammon/EHS Manager
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146-4493

Re: Hukill Chemical Corporation
EPA I.D. No.: OHD 001 926 740

Dear Ms. Gammon:

On May 13, 2003, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected the Hukill Chemical Corporation located in Bedford, Ohio. In response to violations of the organic air emission standards of 40 CFR Part 265, Subpart AA, identified during the inspection, we issued a Notice of Violation to you on April 26, 2004. Subsequent to our Notice of Violation you submitted additional information regarding the identified violations in correspondence dated August 13, 2004.

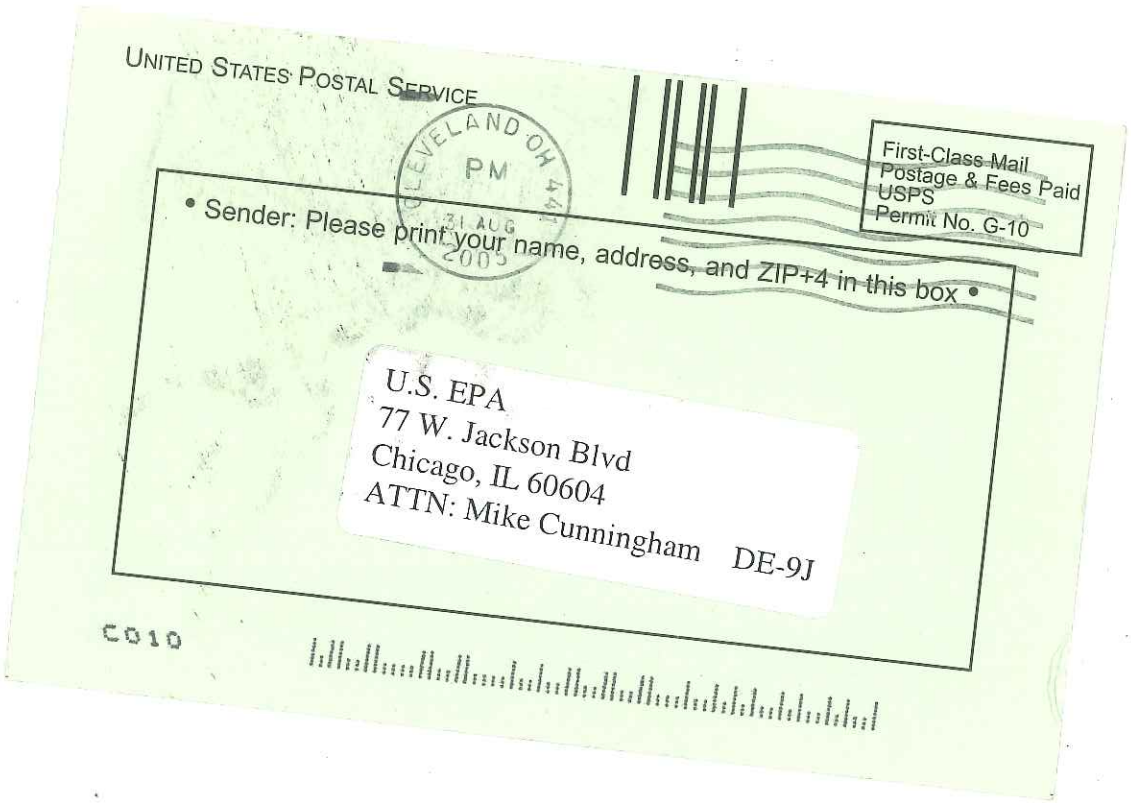
This letter is to inform you that U.S. EPA has reviewed the referenced response, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. U.S. EPA and the Ohio Environmental Protection Agency will continue to evaluate your facility in the future.

If you have any questions or concerns regarding this matter, please contact Michael Cunningham at (312) 886-4464.

Sincerely,

Paul Little, Chief
Enforcement and Compliance Assurance Branch
Compliance Section 2

cc: Marlene Kinney, OEPA, NEDO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• Sender: Please print your name, address, and ZIP+4 in this box •
U.S. EPA
77 W. Jackson Blvd
Chicago, IL 60604
ATTN: Mike Cunningham DE-9J
C010

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Marian M. (Heffner) Gammon/EHS Manager
Hukill Chemical Corporation
7013 Krick Road
Bedford, OH 44146-4493

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)*

B. Date of Delivery 8/31/05

C. Signature

X R. Gammon

☐ Agent
☐ Addressee

D. ...ery address different from item 1? ☐ Yes
...nter delivery address below: ☐ No

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☑ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. A... *(Tr... ...rn service label)* 7001 0320 0006 0176 6656

PS Form 3811, March 2001 Domestic Return Receipt 102595-01-M-1424

Waste, Pesticides and Toxics Division

Type of Document:
- ☐ Termination of Order
- ☐ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action
- ☒ RTC letter

Facility Name : Hukill Chemical

Facility Location: 7013 Krick Road

City: Bedford **State:** Ohio

U.S. EPA ID# OHD001926740

Assigned Staff Richard Cunningham **Phone:** 64464

Name	Signature	Date
Author		8-29-05
Regional Counsel		
Section Chief		8-29-05
Branch Chief		
Division Director		

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file copy.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

Michael Mcclary/R5/USEPA/US@EPA
04/16/04 05:37 PM

To: Michael Cunningham/R5/USEPA/US@EPA
cc:
Subject: Re: Hukill NOV

Mike-- at long last. Sorry about the delay. Just a couple additions. mike

(See attached file: HukillNOV041604.wpd)

Michael Cunningham
04/06/2004 10:33 AM

To: Michael Mcclary/R5/USEPA/US@EPA
cc:
Subject: Hukill NOV

Mike, attached is the Hukill NOV for your approval... remember, this site has a State Haz Waste permit, and was in exsistance before 1980. They do not have a Federal portion of the permit, and Ohio is not authorized for AA, hence the 265 cite for the violations. Thanks! Mike C. 6-4464
(See attached file: HukillNOV.wpd)(See attached file: HUKILLir.wpd)

HukillNOV041604.wpd HukillNOV.wpd HUKILLir.wpd

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF
DE-9J

APR 26 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Vince Valentino
Plant Manager
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
Hukill Chemical Corporation
EPA I.D. No.: OHD 001 926 740

Dear Mr. Valentino:

On May 13, 2003, representatives of the United States Environmental Protection Agency (U.S. EPA) and the Ohio Environmental Protection Agency (OEPA) inspected the Hukill Chemical Corporation located in Bedford, Ohio (the facility). The purpose of the inspection was to evaluate the facility's compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA). The U.S. EPA representative evaluated the facility's compliance with specific regulations related to organic air emission standards for hazardous waste generators and treatment, storage and disposal facilities found at 40 CFR Part 265, Subparts AA, BB, and CC. A copy of the inspection report for U.S. EPA's evaluation is enclosed for your reference.

Based on information provided by facility personnel, review of records, and physical observations by the inspectors, U.S. EPA finds that Hukill Chemical Corporation is in violation of the following requirements:

1. The State of Ohio's authorized RCRA Program does not include RCRA Subpart AA air emission control requirements for storage facility process vents. Therefore federal RCRA Subpart AA requirements apply to the facility, and because the facility has fully complied with the requirements for interim status, the requirements of 40 CFR Part 265, rather than Part 264, apply. See, 40 CFR §§ 265.1(b). Accordingly, 40 CFR §265.1032(a) requires the owner and operator of a facility with process vents associated with solvent extraction operations managing hazardous waste with organic concentrations with at least 10 ppmw to either reduce total organic emissions from all affected process vents below 3 lb/h and

3.1 tons/yr or to reduce, by use of a control device, total organic emissions from all affected process vents by 95 weight percent. At the time of the inspection, emissions from the process vents associated with the two LUWA thin film evaporators, and the fractional distillation column had not been reduced to below 3 lb/h and 3.1 tons/yr or reduced by 95 weight percent by use of a control device. The facility therefore violated the above-referenced requirement.

2. 40 CFR § 265.1035(b)(2) requires the owner and operator to have in the facility operating record up-to-date documentation of compliance with the process vent standards in § 265.1032. At the time of the inspection, the facility did not have up-to-date documentation of compliance with the process vent standards in § 265.1032. The facility therefore violated this recordkeeping requirement.

According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above requirements.

You should submit your response to Michael Cunningham, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Michael Cunningham of my staff at (312) 886-4464.

Sincerely yours,

Paul Little

Paul Little, Chief
Compliance Section # 2
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure

cc: Marlene Kinney, OEPA, NEDO w/enc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION 5
WASTE, PESTICIDES and TOXICS DIVISION

RCRA Compliance Evaluation Inspection Report

I. INSTALLATION IDENTIFICATION

Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146

U.S. EPA ID No. OHD 001 926 740

II. DATE OF INSPECTION

May 13, 2003

III. PARTICIPANTS

Michael Cunningham, Environmental Scientist
U.S. EPA (312)886-4464

Marlene Kinney
Ohio Environmental Protection Agency
Northeast District Office (330) 963-1162

Judy Trader
Environmental Engineer
Hukill Chemical Corporation (440) 232-9400 Ext. 230

IV. INSTALLATION OPERATIONS

Hukill Chemical Corporation (Hukill) is a chemical distribution and solvent recovery facility. Waste solvents are reclaimed in two Luwa thin film evaporators or a fractional distillation column. Hazardous waste is also blended for use as a supplemental fuel, or shipped off site for disposal. Ohio EPA issued Hukill a RCRA hazardous waste permit (Number 02-18-0315) for container and tank storage on August 30, 1998.

There is one conservation vent associated with the fractional distillation operation. Each Luwa thin film evaporator is equipped with a vacuum pump which exhausts into a header system where the emissions from both units are combined. There is also a conservation vent associated with the Luwa thin film evaporators. Hukill's Leak Detection Monitoring Data Sheet indicates that the waste feed streams for the distillation and Luwa units contain greater than ten ppmw organic concentration and are in light liquid service. There are currently eighteen hazardous waste storage tanks on site. Tanks 8, 9, 10, and 11 are process feed tanks

located in the processing and reclamation room. These tanks hold waste solvents which are fed into the column or Luwa units. At the time of the inspection Tank 11 was out of service. Tanks 13, 14, 15, and 16 are located next to the east warehouse drum storage and processing area. These tanks are used to store the waste transferred from the drums and are used for storing blended fuel. Tanks 52, 53, 55, 56, 57, 58, 59, 60, 61, and 62 are all spent solvent storage tanks. All of these tanks have a fixed roof and conservation vent.

V. INSPECTION FINDINGS

The inspection consisted of a tour of the site and a review of records. Upon arrival at the site, I presented my credentials to Ms. Judy Trader. She accompanied us on the tour and provided the information in this report.

U.S. EPA evaluated compliance with the hazardous waste regulations governing organic air emissions found at 40 CFR Part 265, Subparts AA, BB, and CC.

The two Luwa thin film evaporators and the fractional distillation column manage hazardous waste with organic concentrations of at least 10 ppmw. The Hukill facility is subject to the hazardous waste permitting requirements due to its hazardous waste storage activities. At the time of the inspection Hukill did not have records for demonstrating that total organic emissions from the process vents at the facility were reduced to below 3 pounds per hour and 3.1 tons per year, or, by use of a control device, by 95 weight percent. Ms. Trader told the inspectors that, based on recent emissions testing, the company had not met the 3.1 tons per year emission rate limit for the distillation and LUWA process vents. She also told the inspectors that this information had been disclosed in writing to the Ohio Environmental Protection Agency.

Ms. Trader provided a list of equipment that was subject to the leak detection monitoring requirements of 40 CFR Part 265 Subpart BB. The pumps and valves on these lists were being monitored monthly for leak detection using Reference Method 21.

All of the hazardous waste tanks have a capacity of less than 20,000 gallons, and are not used to heat or treat the contents. Information regarding the maximum vapor pressure determination was provided in a May 16, 2003, letter to U.S. EPA. This determination indicates the vapor pressure of the hazardous waste in the tanks does not exceed 574.5 mm Hg (76.6 kPa). These tanks meet the Level 1 control

requirements for emissions specified in 40 CFR 265.1085(c).

The following photographs taken during the inspection are included with this report:

1. Hazardous waste tanks 8, 9,and 10;
2. Pipes associated with Luwa units;
3. Luwa units;
4. Drum (mis-flash);
5. Drum label from process room;
6. Drum label from process room;
7. Drum storage area in process room;
8. Top of hazardous waste tank 9;
9. Two after-condensers for Luwa units;
10. Still pot outside process area;
11. Spent solvent storage tank farm;
12. Spent solvent storage tank farm;
13. Hazardous waste tanks 13, 14, 15, and 16;
14. Top of tanks 14, 15, and 16;
15. Top of tank 13;
16. Top of tank 13;
17. Hazardous waste storage area for non-liquids;
18. Drum storage area;
19. Drum storage area;
20. Drum processing units for tanks 13 through 16.

Checklists for Subparts AA, BB, and CC are attached to this report.

INTERIM STATUS FACILITIES ORGANIC AIR EMISSION STANDARDS FOR PROCESS VENTS

Facility's Name Hukill Chemical Corporation

Date May 13, 2003 ID# OHD 001 926 740

: Use of the words "process vents" means process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction or air or steam stripping operations managing hazardous waste with organic concentrations of at least 10 ppmw (time weight annual average basis).

Note: Total Organic Emissions shall be abbreviated to TOE

(rev. 7/3/96 - EAB-MDEQ)

NI - not inspected N/A - not applicable

YES	NO	NI	N/A

APPLICABILITY (40 CFR 265.1030)

1. Manage hazardous waste w/ organic concentrations of at least 10 ppmw in units w/ process vents? (265.1030(b))	DAE	Yes *

IF YES

a) Are the units subject to the permitting requirements under part 270? (265.1030(b)(1))	DAE	*

OR

b) Are there hazardous waste recycling units with process vents that are located at the facility that is otherwise subject to the permitting requirements? (265.1030(b)(2))	DAE	Yes *

* If the answers to the above questions is no the following regulations do not apply, except you must verify the facility waste has less than 10 ppmw: see 40 CFR 265.1034(d) and 40 CFR 265.1034(e) and this information must be recorded in a log: 40 CFR 265.1035(f).

STANDARDS: PROCESS VENTS (40 CFR 265.1032)

Note: A determination of vent emissions may be based on engineering calculations or tests (265.1032(c)) with any performance tests meeting the requirements of 265.1034(c).

2. Has the owner/operator of a facility with process vents:		
a) Reduced TOE from all affected process vents < 1.4 kg/h (3 lb/h) & 2.8 mg/yr (3.1 tons/yr)? (265.1032(a)(1))	DAE	[ ] NO NI N/A

OR

b) Reduced, by use of a control device (that meets the requirements of 265.1033) the TOE from all affected process vents by 95 weight percent? (265.1032(a)(2))	DAE	[ ] NO NI N/A

Note: If the process vents emit below the limits with out an add-on control device the facility the only additional requirement is 265.1035(f)

STANDARDS: CLOSED-VENT SYSTEMS AND CONTROL DEVICES (40 CFR 265.1033)

3. Was a closed-vent system and control device installed by 12/21/90 or as per an implementation schedule with a completion date as soon as possible but no later than June 21, 1992? (265.1033(a)(2))	DAE	[ ] NO NI N/A
4. If the owner/operator has installed a closed-vent system and control device by their effective date, was: (265.1033(a)(1))		
a) Control device involving vapor recovery designed/operated to recover organic vapors vented to it w/ an efficiency of 95 weight percent or greater? (265.1033(b)) (N/A if TOE for all affected process vents can be attained at an efficiency less than 95 weight percent?)	DAE	[ ] NI N/A
b) Enclosed combustion device designed and operated to reduce organic emissions vented to it by 95 weight percent or greater to: (265.1033(c))		
I) Achieve a total organic compound concentration of 20 ppmv?	DAE	[ ] NI N/A

OR

ii) Provide minimum resident time of 0.50 seconds at minimum temp. of 760 degrees C? (265.1033(c))	DAE	[ ] NI N/A
c) A flare:		
I) Designed/operated w/ no visible emissions except periods not to exceed total of 5 minutes during any 2 consecutive hours? (255.1033(d)(1))	DAE	[ ] NI N/A
ii) Operated with a flame present at all times? (265.1033(d)(2))	DAE	[ ] NI N/A

		YES NO NI N/A
iii) Used only if: (265.1033(d)(3))		
a) Net heating value of gas being combusted is ≥ 300 Btu/scf if flare is steam or air assisted?	DAE	[ ] NI N/A

OR

b) If the net heating value of the gas being combusted is 200 Btu/scf. or greater if the flare is non-assisted?	DAE	[ ] NI N/A
d) Was the steam-assisted or non-assisted flare designed and operated with an exit velocity: (265.1033(d)(4)(I-iii))		
I) Less than 60 ft/s? Except if,	DAE	[ ] NI N/A
ii) ≥ 60 ft/s but < 400 ft/s? (Only allowed if net heating value of gas is greater than 1000 Btu/scf)	DAE	[ ] NI N/A
iii) Less than the velocity, Vmax and less than 400 ft/s?	DAE	[ ] NI N/A
e) Was air-assisted flare designed and operated with an exit velocity less than the velocity Vmax? (265.1033(d)(5))	DAE	[ ] NI N/A

Note: The formulas needed to determine #4.d & #4.e. are found in 265.1033(e)(2-5).

f) For a flare was:		
I) Method 22 used to determine compliance with visible emissions? (265.1033(e)(1))	DAE	co rep. said ___ [ ] NI N/A
ii) The net heating value of the gas being combusted calculated correctly? (265.1033(e)(2))	DAE	co rep. said ___ [ ] NI N/A
iii) The actual exit velocity correctly determined? (265.1033(e)(3))	DAE	co rep. said ___ [ ] NI N/A
iv) The maximum allowed velocity calculated correctly? (265.1033(e)(4))	DAE	co rep. said ___ [ ] NI N/A
v) The maximum allowed velocity for air assisted flare calculated correctly? (265.1033(e)(5))	DAE	co rep. said ___ [ ] NI N/A
5. Did the owner/operator monitor and inspect each control device required to ensure proper operation and maintenance by: (265.1033(f)(1))		
a) Installing/calibrating/maintaining/operating flow indicator w/ record of vent stream flow at least once per hour?	DAE	[ ] NI N/A
b) Installing/calibrating/maintaining/operating device to continuously monitor control devices as specified below: (265.1033(f)(2))		
I) Thermal vapor incinerator, a temperature monitoring device equipped with a continuous recorder?	DAE	[ ] NI N/A
ii) Catalytic vapor incinerator, a temperature monitoring device equipped with a continuous recorder?	DAE	[ ] NI N/A
iii) Flare/heat sensing monitoring device have a continuous recorder giving continuous ignition pilot flame?	DAE	[ ] NI N/A
iv) Boiler/process heater w/ design heat input capacity <44MW, a temp. monitoring device w/ a continuous recorder?	DAE	[ ] NI N/A
v) Boiler/process heater w/ design heat input capacity ≥44MW, a monitoring device w/ a continuous recorder to measure parameter(s) that indicates good combustion operating practices?	DAE	[ ] NI N/A
vi) For a condenser, either: (265.1033(f)(2)(vi))		
a) Monitoring device w/ continuous recorder for concentration of organic compounds in exhaust vent stream?	DAE	[ ] NI N/A

OR

b) A temperature monitor device equipped with continuous recorder?	DAE	[ ] NI N/A
vii) A carbon adsorption system that regenerates the carbon bed directly in the control device, either: (265.1033(f)(2)(vi))		
a) Monitoring device w/ continuous recorder for concentration of organic compounds in exhaust vent stream?	DAE	[ ] NI N/A

OR

		YES	NO	NI	N/A
b) Monitor device w/ continuous recorder to measure parameter that indicates the carbon bed is regenerated on a regular predetermined time cycle?	DAE	[ ]		NI	N/A

AND

c) Replaces existing carbon w/ fresh at pre-set interval no longer than carbon service life? (265.1033(g))	DAE	[ ]	NI	N/A
viii) If using a carbon adsorption system that does not regenerate carbon bed on-site in the control device, the existing carbon will be replaced w/ fresh carbon on a regular basis by either: (265.1033(h)(1-2))				
a) Monitoring the concentration level of the organic compounds regularly and replace the carbon with fresh immediately after break-through?				
I) Monitoring daily?	DAE	[ ]	NI	N/A
ii) Monitoring at interval no greater than 20% of time required to consume total carbon working capacity?	DAE	[ ]	NI	N/A
b) Replace the existing carbon with fresh at regular, predetermined intervals?	DAE	[ ]	NI	N/A
c) Inspecting readings from (except 265.1033(h)) monitoring device(s) at least once each operating day? (265.1033(f)(3))	DAE	[ ]	NI	N/A

AND

d) If needed, implement necessary corrective measures to ensure control devices work? (265.1033(f)(3))	DAE	[ ]	NI	N/A

Note: An alternative operational or process parameter may be monitored see 40 CFR 265.1033(I).

6. The closed-vent system(s):				
a) Was it designed for and operated with no visible emissions? (265.1033(j)(1))	DAE	[ ]	NI	N/A
b) Have initial leak detection monitoring conducted: (265.1033(j)(2))				
I) By date facility becomes subject to these regulations?	DAE	[ ]	NI	N/A
ii) Annually thereafter?	DAE	[ ]	NI	N/A
c) Control detectable emissions (>500 ppm) as soon as possible but: (265.1033(j)(3-4))				
I) No later than 15 calendar days after detected?	DAE	[ ]	NI	N/A
ii) First attempt at repair made no later than 5 calendar days after detection?	DAE	[ ]	NI	N/A
7. Were closed-vent systems and control devices operated at all times when emissions may be vented to them? (265.1033(k))	DAE	co. rep said [ ]	NI	N/A

TEST METHODS AND PROCEDURE (40 CFR 265.1034)

8. Were correct test methods and procedures used? (265.1034(a))				
a) For a closed-vent system tested for no detectable emissions? (265.1034(b)(1-7))	DAE	[ ] ND	NI	N/A
b) To determine compliance with the 10 ppmw and with the total organic compound limit (95%)? (265.1034(c))	DAE	[ ] ND	NI	N/A
9. Did the facility determine that the process vents are not subject to the requirements of this subpart? If so, did the owner/operator make an initial determination that the time-weighted annual average total organic concentration managed by the unit is less than 10 ppmw by: (265.1034(d))				
a) Direct measurement? (265.1034(d)(1))	DAE	[ ]	NI	N/A
b) Using knowledge? (265.1034(d)(2))	DAE	[ ]	NI	N/A
10. Was the determination that distillation, fractionation, thin-film evaporation, solvent extraction or air or stream stripping operations manage hazardous wastes time-weighted annual average total organic concentration is less than 10 ppmw made as follows: (265.1034(e))				
a) By date the facility is first subject to the regulations or the date the waste is first managed, whichever is first?	DAE	[ ]	NI	N/A
b) For continuously generated waste annually?	DAE	[ ]	NI	N/A

	YES NO NI N/A

OR

c) When there is change in way waste being managed or in the process that generates the waste? (265.1034(e)(3))	DAE	[ ] NI N/A

RECORDKEEPING REQUIREMENTS (40 CFR 265.1035)

Note: If there is more than one managed unit the facility can use one recordkeeping system. (265.111035(a)(2))

11. Did the owner/operator record the following information in the facility operating record: (265.1035(b))		
a) The schedule and the rational, if the facility needed to develop an implementation schedule? (265.1035(b)(1))	DAE	[ ] NO NI N/A
b) Up-to-date process vent documentation?		
I) Information & data: (265.1035(b)(2)(I))		
a) Identifying all effected process vents?	DAE	[ ] NO NI N/A
b) Annual throughput and operating hours of each effected unit?	DAE	[ ] NO NI N/A
c) Estimated emission rates for each effected vent & for overall facility?	DAE	[ ] NO NI N/A
d) Location of each effected vent on plot plan?	DAE	[ ] NO NI N/A
ii) Information and data supporting determinations of vent emissions and emission reductions achieved by add-on control devices based on engineering calculations or source tests? (265.1035(b)(2)(ii))	DAE	[ ] NO NI N/A
c) If tests were used to determine organic removal efficiency or total organic compound concentration was there a performance test plan, which include: (265.1035(b)(3)(ii)(A-E))		
I) Engineering description of closed vent system and control device including:		
a) Manufacture name and model #?	DAE	[ ] NO NI N/A
b) Type of control device?	DAE	[ ] NO NI N/A
c) Dimensions?	DAE	[ ] NO NI N/A
d) Capacity?	DAE	[ ] NO NI N/A
e) Construction materials?	DAE	[ ] NO NI N/A
ii) Description of sampling and monitoring procedures, including: (265.1035(b)(3)(iii))		
a) Location?	DAE	[ ] NO NI N/A
b) Equipment?	DAE	[ ] NO NI N/A
c) Frequency?	DAE	[ ] NO NI N/A
d) Procedures?	DAE	[ ] NO NI N/A
d) Documentation on the closed-vent systems and the control devices required in 265.1033, specifically: (265.1035(b)(4))		
I) List of all information, references and sources used to prepare documentation? (265.1035(b)(4)(I))	DAE	[ ] NI N/A
ii) Records with dates of compliance tests?	DAE	[ ] NI N/A
iii) Engineering calculations for design analysis/specifications/drawings/schematics/piping/instrument diagrams include: (265.1035(b)(4)(iii))		
a) Thermal vapor incinerators, consider vent stream composition/constituent composition/flow rate. Included design minimum, average temperature & residence time in the combustion zone? (265.1035(b)(4)(iii)(A))	DAE	[ ] NI N/A
b) Catalytic vapor incinerators, consider vent stream composition/constituent composition/flow rate. Include design minimum & average temperature across the catalyst bed inlet and outlet? (265.1035(b)(4)(iii)(B))	DAE	[ ] NI N/A
c) Boiler or process heater, consider vent stream composition/constituent composition/flow rate. Include design minimum & average flame zone temperatures, combustion zone residence time & where vent system is introduced? (265.1035(b)(4)(iii)(C))	DAE	[ ] NI N/A
d) Flare, consider vent stream composition/constituent composition/flow rate. Design analysis requirements are in 265.1033(d)? (265.1035(b)(4)(iii)(D))	DAE	[ ] NI N/A

		YES	NO	NI	N/A
e) Condenser, consider vent stream composition/constituent composition/flow rate/relative humidity & temp. Include design outlet organic compound concentration level, design average temp. of the exhaust vent stream, and the design average temp. of the coolant fluid at the condenser outlet and inlet? (265.1035(b)(4)(iii)(E))	DAE	[ ]		NI	N/A
f) Carbon adsorption system that regenerates bed on-site in the control device, consider the vent stream composition/constituent concentrations/flow rate/relative humidity/temperature. Include design exhaust vent stream organic compound concentration level/number & capacity of carbon beds/type & capacity of activated carbon/total stream flow/bed steaming/cooling/drying cycles/temp. regeneration/time of regeneration/service life? (265.1035(b)(4)(iii)(F))	DAE	[ ]		NI	N/A
g) Carbon adsorption system that does not regenerate on-site in a control device, consider the vent stream composition/constituent concentrations/flow rate/relative humidity/temperature. Include the design outlet organic concentration level/capacity of the bed/type & capacity of the carbon in the bed/replacement interval? (265.1035(b)(4)(iii)(G))	DAE	[ ]		NI	N/A
e) A statement signed/dated by the owner/operator certifying that the operating parameters used in the design analysis reasonably represent the conditions that exist when the hazardous waste management unit is or would be operating at the highest load or capacity level reasonably expected to occur? (265.1035(b)(iv))	DAE	[ ]		NI	N/A
f) A statement signed/dated by the owner/operator certifying that the control device is designed to operate at an efficiency of $\geq$ 95% (are alternatives)? A statement from the device manufacture or vendor certifying that the control equipment meets the design specifications will suffice? (265.1035(b)(v))	DAE	[ ]		NI	N/A
g) If test performance tests are used to demonstrate compliance, all test results? (265.1035(b)(vi))	DAE	[ ]		NI	N/A
h) Design documentation & monitoring/operating & inspection information for each closed-vent system/control device recorded, kept up-to-date and including: (265.1035(c))					
I) Description and date of each modification? (265.1035(c)(1))	DAE	[ ]		NI	N/A
ii) Id operating parameters/describe monitoring devices/diagram monitoring sensor locations? (265.1035(c)(2))	DAE	[ ]		NI	N/A
iii) Monitoring/operating & inspection information required in 265.1033(f-j)? (265.1035(c)(3))	DAE	[ ]		NI	N/A
iv) Date, time and duration when monitoring values exceed the value established? (254.1035(c)(4))	DAE	[ ]		NI	N/A
v) Explanation for each period the control device operating parameter exceeded the design value & the measures implemented to correct the control device? 265.1035(c)(5))	DAE	[ ]		NI	N/A
vi) Carbon adsorption systems where the carbon is regenerated in the control device or a system that changes the carbon at a regular, predetermined interval give the date when existing carbon is replaced? (265.1035(c)(6))	DAE	[ ]		NI	N/A
vii) For a carbon adsorption system that changes the carbon at breakthrough have a log that records: (265.1035(c)(7)(I-ii))					
a) Date and time of breakthrough and the monitoring device reading?	DAE	[ ]		NI	N/A
b) Date when existing carbon is replaced with fresh carbon?	DAE	[ ]		NI	N/A
viii) Date of control device start up and shut down? (265.1035(c)(8))	DAE	[ ]		NI	N/A
I) Control device other than thermal or catalytic vapor incinerator/flare/boiler/process heater/condenser/carbon adsorption bed, the monitoring/inspection information indicating proper operation & maintenance? (265.1035(e))	DAE	[ ]		NI	N/A
j) Up-to-date information/data used to determine if a process vent falls under (265.1032) & supporting documentation (265.1034(d)(2)) when knowledge of the nature of hazardous waste stream or process is used? (265.1035(f))	DAE	[ ]		NI	N/A
12. Are records of monitoring, operating and inspection information kept at least 3 years? (265.1035(d))	DAE	[ ]		NI	N/A

INTERIM STATUS FACILITIES ORGANIC AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS

Facility's Name Hukill Chemical Corporation

Date May 13, 2003 ID# OHD 001 926 740

te: Use of the words "process vents" means process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction or air or steam stripping operations managing hazardous waste with organic concentrations of at least 10 ppmw (time weight annual average basis).

Note: Total Organic Emissions shall be abbreviated to TOE

Note: Equipment with closed-vent systems and control devices shall comply with the provisions of section 265.1033.

(rev. 7/3/96 - EAB-MDEQ)

NI - not inspected **N/A - not applicable**

	YES	NO	NI	N/A

APPLICABILITY (40 CFR 265.1050)

1. If the equipment contains or contacts hazardous waste w/ organic concentrations of at least 10 percent by weight:					
a) Are the units subject to the permitting requirements of part 270? (265.1050(b)(1))	DAE				*
OR					
b) Are there hazardous waste recycling units located at the facility that are otherwise subject to the permitting requirements? (265.1050(b)(2))	DAE	Yes			*

* If the answers to the above questions are no the following regulations do not apply.

STANDARDS: PUMPS IN LIGHT LIQUID (40 CFR 265.1052)

Note: Delays in repair are allowed see 265.1059 (#37)

Note: Did the owner/operator subject to the provisions of this subpart comply with the required test methods and procedures: (265.1063(b-I)) (#41)

2. Pump equipped w/ duel mechanical seal system that includes a barrier fluid system? If yes, its exempt from monthly monitoring (#5) and visual inspections (#6) if: (265.1052(d))		NO	NI	N/A
a) Each duel mechanical seal system is:				
I) Operated with a barrier fluid with pressure greater than the pump stuffing box pressure. (265.1052(d)(1)(I))	DAE	[ ]	NI	N/A
OR				
ii) Has a barrier fluid degassing reservoir connected by closed-loop to a control device. (265.1052(d)(1)(ii))	DAE	[ ]	NI	N/A
OR				
iii) System that purges the barrier fluid into a hazardous waste stream w/no detectable emissions? (265.1052(d)(1)(iii))		[ ]	NI	N/A
b) Barrier fluid is not a hazardous waste w/ organic concentrations 10% or greater by weight. (265.1052(d)(2))	DAE	[ ]	NI	N/A
c) Each barrier fluid system equipped w/ a sensor to detect failure of the seal/barrier fluid system. (265.1052(d)(3))	DAE	[ ]	NI	N/A
d) Each calendar week pump has visual inspection for signs of liquids dripping from pump seals. (265.1052(d)(4))	DAE	[ ]	NI	N/A
e) Each sensor is checked: (265.1052(d)(5)(I))				
I) Daily.	DAE	[ ]	NI	N/A
OR				
ii) Equipped with audible alarm that is checked monthly to see if working.	DAE	[ ]	NI	N/A
f) Owner/operator has determined a criteria indicating failure of the seal/barrier fluid system. (265.1052(d)(5)(ii))	DAE	[ ]	NI	N/A
g) Indications of liquids dripping from pump seal/sensor means failure of seal/barrier fluid system & a leak has been detected: (265.1052(d)(6)(I))				
I) Was it repaired as soon as practicable but no later than 15 calendar days after detected? (265.1052(d)(6)(ii))	DAE	[ ]	NI	N/A
ii) A first attempt at repair was made no later than 5 calendar days after leak is detected? (265.1052(d)(6)(iii))	DAE	[ ]	NI	N/A
3. The pump designed as in 264.1064(g)(2) for no detectable emissions as indicated by an instrument reading of < 500 ppm above background? Yes, pump exempt from monthly monitoring (#5), visual monitoring (#6), repairs (#7a & #7b) and barrier fluid system (#2) if: (265.1052(e))			NI	N/A
a) It does not have an externally actuated shaft penetrating the pump housing. (265.1052(e)(1))	DAE	[ ]	NI	N/A

		YES NO NI N/A
b) It operates with no detectable emissions as indicated w/ emission reading of < 500 ppm. (265.1052(e)(2))	DAE	[ ] NI N/A
c) Is tested for compliance initially, annually and when requested by Regional Administrator. (265.1052(e)(3))	DAE	[ ] NI N/A
4. Is the pump equipped with a closed-vent system capable of capturing and transporting any leakage from seal(s) to the control device? If yes, the pump is exempt from monthly monitoring (#5), visual monitoring (#6), repairs (#7a & #7b), barrier fluid system (#2) and no detectible emission (#3). (265.1052(f))	DAE	NI N/A
5. Is each pump in light liquid service monitored monthly to detect leaks? (265.1052(a)(1))	DAE	✓ NI N/A
6. Does each pump in light liquid service have a visual inspection each calendar week for indications of liquid dripping? (265.1052(a)(2))	DAE	✓ NI N/A
7. Was an instrument reading of 10,000 ppm or greater measured or were there are any indications of liquids dripping from the pump seal? If yes, a leak is detected and:	DAE	NO NI N/A
a) Was it repaired as soon as practicable but no later than 15 calendar days after detected? (265.1052(c)(1))	DAE	[ ] NI N/A
b) Was a first attempt at repair made no later than 5 calendar days after leak is detected? (265.1052(c)(2))	DAE	[ ] NI N/A

STANDARDS: COMPRESSORS (40 CFR 265.1053)

NOTE: Delays in repair are allowed see 265.1059 (#37)

8. Is the compressor designed as described in 265.1064(g)(2), for no detectable emissions indicated by instrument reading of < 500 ppm above background? If yes the compressor is exempt from seal system and operation (#10-11), barrier fluid concentration (#12), barrier system sensor(#13-14), criteria for failure (#15), leak detection/repair (#16) and closed-vent (#9). (265.1053(I))	DAE	NONE NI N/A
9. Is the compressor equipped with a closed-vent system capable of capturing and transporting leakage from the seal(s) to a control device in compliance w/ 265.1060? If yes, the compressor is exempt from seal system (#10) and seal system operation (#11). (265.1053(h))	DAE	NI N/A
10. Each compressor equipped w/ seal system that has barrier fluid system that prevents leakage of TOE? (265.1053(a))	DAE	[ ] NI N/A
11. Is each compressor seal system: (265.1053(b))		
a) Operated with the barriers fluid at a greater pressure than the stuffing box pressure? (265.1053(b)(1))	DAE	[ ] NI N/A

OR

b) Equipped with a barrier fluid system connected by a closed-vent system to a control device? (265.1053(b)(2))	DAE	[ ] NI N/A

OR

c) Equipped with a system that purges the barrier fluid system with no detectable emissions? (265.1053(b)(3))	DAE	[ ] NI N/A
12. Is the barrier fluid system a hazardous waste w/ an organic concentration of 10% or greater by weight? (265.1053(c))	DAE	[ ] NI N/A
13. Each barrier system equipped w/ a sensor to detect failure of the seal/barrier fluid system? (265.1053(d))	DAE	[ ] NI N/A
14. Is each barrier system sensor checked: (265.1053(e)(1))		
a) Daily?	DAE	[ ] NI N/A

OR

b) Equipped with audible alarm that is checked monthly to see if working?	DAE	[ ] NI N/A

UNLESS

c) The compressor is located at an unmanned plant then is the sensor checked daily?	DAE	[ ] NI N/A
15. Has the owner/operator determined a criterion to indicate failure of the seal/barrier fluid system? (265.1053(e)(2))	DAE	[ ] NI
16. Did the sensor indicates failure of the seal/barrier fluid system? If yes, a leak is detected and: (265.1053(f))	DAE	NI N/A

		YES	NO	NI	N/A
a) Was it repaired as soon as practicable but no later than 15 calendar days after detected? (265.1052(g)(1))	DAE	[ ]		NI	N/A
b) Was a first attempt at repair was made no later than 5 calendar days after leak is detected? (265.1052(g)(2))	DAE	[ ]		NI	N/A

STANDARDS: PRESSURE RELIEF DEVICES IN GAS/VAPOR SERVICE (40 CFR 265.1054)

NOTE: Delays in repair are allowed see 265.1059 (#37)

17. Is the pressure relief device equipped with a closed-vent system capable of capturing and transporting leakage to a control devices specified in 265.1060? If yes, the device is exempt from relief device monitored for no detectable emissions (#18), specifications to reset device and time frame (#19 & #20). (265.1054(c))	DAE	NONE	NI N/A
18. Pressure relief devices in gas/vapor service operated w/ no detectable emissions indicated by an instrument reading of < 500 ppm above background, except during pressure releases? (265.1054(a))	DAE	[ ]	NI N/A
19. After a pressure release, was the device returned to a condition of no detectable emissions indicated by an instrument reading of < 500 ppm above background, as soon as practical but no later than 5 calendar days? (265.1054(b)(1))	DAE	[ ]	NI N/A
20. No later than 5 calendar days after a pressure release, is the pressure relief device monitored to confirm no detectable emissions indicated by an instrument reading of < 500 ppm above background,? (265.1054(b)(2))	DAE	[ ]	NI N/A

STANDARDS: SAMPLING CONNECTING SYSTEMS (40 CFR 265.1055)

21. Is the sampling system *in situ*? If yes, the system isn't required to have closed-vent or closed-purge system (#22 & #23). (265.1055(c))	DAE	Yes	NI N/A
22. Is each sampling connection system equipped with a closed-purge system or closed-vent system? (265.1055(a))	DAE	[ ]	NI N/A
23. Does each closed-purge or closed-vent system: (265.1055(b))			
a) Return purged hazardous waste stream directly to hazardous waste management process line w/ no detectable emissions? (265.1055(b)(1))	DAE	[ ]	NI N/A

OR

b) Collect and recycle the purged hazardous waste stream with no detectable emissions? (265.1055(b)(2))	DAE	[ ]	NI N/A

OR

c) Designed/operated to capture/transport all purged hazardous waste stream to a control device? (265.1055(b)(3))	DAE	[ ]	NI N/A

STANDARDS: OPEN-ENDED VALVES OR LINES (40 CFR 265.1056)

Note: Delays in repair are allowed see 265.1059 (#37)

Note: Did the owner/operator subject to the provisions of this subpart comply with the required test methods and procedures: (265.1063(b-I)) (#41)

24. Is each open-ended valve or line equipped with a cap, blind flange, plug or second valve? (265.1056(a)(1))	DAE	[✓]	NI N/A
25. Cap/blind flange/plug/second valve always seal open end except when waste must flow through? (265.1056(a)(2))	DAE	[ ]	NI N/A
26. If using a second valve, is the first valve closed before the second? (265.1056(b))	DAE	[ ]	NI N/A
27. If a double block and bleed system is used and the bleed line/valve stays open during venting, is the line between the block valves have cap/blind flange/plug/second value and sealed at all other times? (265.1056(c))	DAE	[ ]	NI N/A

STANDARDS: VALVES IN GAS/VAPOR SERVICE OR IN LIGHT LIQUID SERVICE (40 CFR 265.1057)

Note: There are alternate standards for valves in gas/vapor or light liquid service where owners/operators may elect to have all valves within a hazardous waste management unit comply with alternative standards which: (1) allows no greater than 2% of the valves to leak. (265.1061(a-d) and (2) allows for skip period leak detection and repair. (265.1062(a-b))

Note: Delays in repair are allowed see 265.1059 (#37)

3. Valve designated as an unsafe-to-monitor valve as described in 265.1064(h)(1). If yes, the valve is exempt from monthly monitoring (#31) if: (265.1057(g))	DAE		NI N/A

		YES	NO	NI	N/A
a) The owner/operator of the valve determines that the valve would be unsafe to monitor because monitoring personnel would be exposed to an immediate danger. (265.1057(g)(1))	DAE	[ ]		NI	N/A
b) The owner/operator of the valve adheres to a written plan that requires monitoring of the valve as often as possible during safe-to-monitor times. (265.1057(g)(2))	DAE	[ ]		NI	N/A
29. Valve designated as a difficult to-monitor valve in 265.1064(h)(2). If yes, the valve is exempt from monthly monitoring (#31) if: (265.1057(h))	DAE			NI	N/A
a) The owner/operator of the valve determines the valve cannot be monitored without elevating personnel more than 2 meters above a support surface. (265.1057(h)(1))	DAE	[ ]		NI	N/A
b) Hazardous waste management unit where valve is located was in operation before 6/21/90. (265.1057(h)(2))	DAE	[ ]		NI	N/A
c) Follow written plan that requires monitoring of valve at least once per calendar year. (265.1057(h)(3))	DAE	[ ]		NI	N/A
30. Valve designated for no detectable emissions, as indicated bt instrument reading of < 500 ppm above background, and described in 265.1064(g)(2). If yes, the valve is exempt from monthly monitoring (#31) if: (265.1057(f))	DAE			NI	N/A
a) It has no external actuating mechanism in contact with the hazardous waste streams. (265.1057(f)(1))	DAE	[ ]		NI	N/A
b) It is operated with emissions < 500 ppm above background. (265.1057(f)(2))	DAE	[ ]		NI	N/A
c) It is tested for emissions initially and then annually. (265.1057(f)(3))	DAE	[ ]		NI	N/A
31. Is each valve, other than unsafe or difficult-to-monitor or no detectible emissions (#28-30), in gas/vapor or light liquid service monitored monthly for leaks? (265.1057(a)) (exemptions 33 & 34)	DAE	[✓]		NI	N/A

OR

32. Any valve for which a leak has not been detected for two successive months may be monitored the first month of every succeeding quarter, until a leak is detected? (265.1057(c)(1))	DAE	[ ]		NI	N/A

Monitor monthly regardless

AND

33. If the monitoring was every quarter and a leak is detected was the monthly monitoring resumed until a leak was not detected for 2 consecutive months? (265.1057(c)(2))	DAE	[ ]		NI	N/A
34. When a leak is detected, by an instrument reading of 10,000 ppm or greater: (265.1057(b)): (265.1057(d)(1))					
a) Was it repaired as soon as practicable but not later than 15 calendar days after detected? (265.1052(d)(1))	DAE	[ ]		NI	N/A
b) Was a first attempt at repair made no later than 5 calendar days after leak is detected? (265.1052(d)(2))	DAE	[ ]		NI	N/A
c) Was the first repair attempt include, but not limited to: (265.1057(e))					
I) Tightening of bonnet bolts?	DAE	[ ]		NI	N/A
ii) Replacement of bonnet bolts?	DAE	[ ]		NI	N/A
iii) Tightening of packing gland nuts?	DAE	[ ]		NI	N/A
iv) Injection of lubricant into lubricating packing?	DAE	[ ]		NI	N/A

STANDARDS: PUMPS AND VALVES IN HEAVY LIQUID SERVICE, PRESSURE RELIEF DEVICES IN LIGHT LIQUID OR HEAVY LIQUID SERVICE AND FLANGES AND OTHER CONNECTORS (40 CFR 265.1058)

NOTE: Delays in repair are allowed see 265.1059 (#37)

35. Are pumps and valves in heavy liquid service, pressure relief devices in light or heavy liquid service and flanges and other connectors monitored within 5 days if evidence of a potential leak is found by visual, audible, olfactory or other detection method? (265.1058(a))	DAE	[ ]		NI	N/A
36. If a leak was detected, by an instrument reading of 10,000 ppm or greater: (265.1058(b))	DAE			NI	N/A
a) Was it repaired as soon as practicable but no later than 15 calendar days after detected? (265.1058(c)(1))	DAE	[ ]		NI	
b) Was a first attempt at repair was made no later than 5 calendar days after leak is detected? (265.1058(c)(2))	DAE	[ ]		NI	N/A

		YES	NO	NI	N/A
c) Was the first repair attempt include, but not limited to: (265.1058(d))					
i) Tightening of bonnet bolts?	DAE	[ ]		NI	N/A
ii) Replacement of bonnet bolts?	DAE	[ ]		NI	N/A
iii) Tightening of packing gland nuts?	DAE	[ ]		NI	N/A
iv) Injection of lubricant into lubricating packing?	DAE	[ ]		NI	N/A

STANDARDS: DELAY OF REPAIR (40 CFR 265.1059)

37. Was there a delay in repair of equipment for which leaks have been detected? If yes, the delay is allowed if:	DAE	NO	NI	N/A
a) Was the repair technically infeasible without a shutdown of the hazardous waste management unit and did the repair occur before the end of the next shutdown? (265.1059(a))	DAE	[ ]	NI	N/A
b) Was the equipment isolated from the hazardous waste management unit and the unit does not contain or contact hazardous waste with organic concentrations at least 10% by weight. (265.1059(b))	DAE	[ ]	NI	N/A
38. Was there a delay in repair of a valve? If yes, the delay is allowed if:	DAE		NI	N/A
a) Determine emissions from purged material from immediate repair are greater than emissions resulting from a delay of the repair. (265.1059(c)(1))		[ ]	NI	N/A
b) When repaired, the purged material is collected and destroyed or recovered in a control device. (265.1059(c)(2))	DAE	[ ]	NI	N/A
39. Was there a delay in repair of a pump? If yes, the delay will be allowed if:	DAE		NI	N/A
a) Repair requires the use of a duel mechanical seal system that includes a barrier fluid system. (265.1059(d)(1))	DAE	[ ]	NI	N/A
b) Repair is completed as soon as practicable but within 6 months. (265.1059(d)(2))	DAE	[ ]	NI	N/A
40. Was there a delay in repair of a valve beyond a hazardous waste management unit shutdown? If yes, the delay will be allowed until the next shutdown or longer if the shutdown is within 6 months if: (265.1059(e))	DAE		NI	N/A
a) The valve assembly replacement is necessary during shutdown.	DAE	[ ]	NI	N/A
b) Valve assembly supplies have been depleted & supplies were sufficiently stocked before supplies were depleted.	DAE	[ ]	NI	N/A

TEST METHODS AND PROCEDURES (40 CFR 265.1063)

41. Did the owner/operator subject to the provisions of this subpart comply with the required test methods and procedures: (265.1063(b-I))				
a) For leak detection monitoring? (265.1063(b))	DAE	[✓]	NI	N/A
b) For 'no detectible' emissions determination? (265.1063(c))	DAE	[ ]	NI	N/A
c) To determine if each piece of equipment contains or contacts a hazardous waste w/ organic concentrations ≥ 10% by weight? (265.1063(d)) analysis and Knowledge	DAE	[✓]	NI	N/A
d) To determine if pumps or valves are in light liquid service? (265.1063(h))	DAE	[✓]	NI	N/A
e) To determine if the control device achieved 95 weight percent organic emissions? (265.1063(I))	DAE	[ ]	NI	N/A
42. Were samples used in determine the percent organic content representative of the highest TOC hazardous waste that is expected to be contained in or contact the equipment? (265.1063(g))	DAE	[✓]	NI	N/A

RECORDKEEPING REQUIREMENTS (40 CFR 265.1064)

Note: Owners/operators with more than one hazardous waste management unit, subject to these regulations, may use one recordkeeping system if each unit is identified.

42. Did the owners/operators record the following information in the operating record for each piece of equipment subject to Subpart BB? (265.1064(b))

		YES	NO	NI	N/A
a) Equipment identification number and hazardous waste management unit identification? (265.1064(b)(1)(I))	DAE	[✓]		NI	N/A
b) Approx. location(s) of the equipment (e.g., identify unit on facility plot plan)? (265.1064(b)(1)(ii))	DAE	[✓]		NI	N/
c) Type of equipment (eg: pump or pipeline valve)? (265.1064(b)(1)(iii))	DAE	[✓]		NI	N/A
d) Percent-by-weight total organics in the hazardous waste stream at the equipment? (265.1064(b)(1)(iv))	DAE	[✓]		NI	N/A
e) State of the hazardous waste at the equipment (eg: liquid or gas/vapor)? (265.1064(b)(1)(v))	DAE	[✓]		NI	N/A
f) Method of compliance w/ the standard (monthly leak detection/repair or equipped w/ dual mechanical seals?	DAE	[✓]		NI	N/A
g) Implementation schedule, if facility can't install a closed-vent system & control device in time?(265.1064(b)(2))	DAE	[ ]		NI	N/A
h) A performance test plan if the owner/operator chose to use test data to demonstrate the organic removal efficiency or total organic compound concentration by the control device? (265.1064(b)(3))	DAE	[ ]		NI	N/A
I) Include documentation of compliance with the closed-vent and control device standards? (265.1064(b)(4))	DAE	[ ]		NI	N/A
j) If a leak is detected?					
I) A weatherproof & readily visible identification attached to the leaking equipment and marked with: (265.1064(c)(1))					
a) The equipment i.d. number?	DAE	[ ]		NI	N/A
b) Date evidence of a potential leak was found?	DAE	[ ]		NI	N/A
c) Date leak was detected?	DAE	[ ]		NI	N/A

Note: The identification on equipment, except a valve, may be removed after repair. (265.1064(c)(2))
Note: The identification on a valve may be removed after being monitored for two successive months without leaks. (265.1064(c)(3))

ii) In an inspection log the following information? (265.1064(d))					
a) Instrument, operator and equipment id number? (265.1064(d)(1))	DAE	[ ]		NI	N/A
b) Date evidence of a potential leak was found? (265.1064(d)(2))	DAE	[ ]		NI	N/A
c) Date leak was detected? (265.1064(d)(3))	DAE	[ ]		NI	N/A
d) Date of each attempt to repair the leak? (265.1064(d)(3))	DAE	[ ]		NI	N/A
e) Repair methods applied in each attempt to repair the leak? (265.1064(d)(4))	DAE	[ ]		NI	N/A
f) "Above 10,000" instrument readings? (265.1064(d)(5))	DAE	[ ]		NI	N/A
g) "Repair delayed" and the reason? (265.1064(d)(6))	DAE	[ ]		NI	N/A
h) Documentation supporting delay in valve repair? (265.1064(d)(7))	DAE	[ ]		NI	N/A
I) Signature of owner/operator whose decision it was not to repair until shutdown? (265.1064(d)(8))	DAE	[ ]		NI	N/A
j) If the repair is not done in 15 days the expected date of a successful repair? (265.1064(d)(9))	DAE	[ ]		NI	N/A
k) The date of successful repair of the leak? (265.1064(d)(10)	DAE	[ ]		NI	N/A
iii) Up-to-date design documentation, monitoring, operating, inspection information for closed-vent & control devices? (265.1064(e))	DAE	[ ]		NI	N/A
iv) Control device (other than thermal or catalytic vapor incinerator/flare/boiler/process heater/condenser/carbon adsorption system) have monitoring/inspection information indicating proper operation/maintenance of control device? (265.1064(f))	DAE	[ ]		NI	N/A
v) The following information regarding the equipment recorded in a log: (265.1064(g))					
a) List of identification numbers for the equipment subject to the requirements and equipment designated for no detectable emissions? (265.164(g)(1)&(2)(I))	DAE	[ ]		NI	N/A
b) The designation of the equipment signed by the owner/operator? (265.1064(g)(2)(ii))	DAE	[ ]		NI	N/A
c) List of identification numbers for pressure relief devices? (265.1064(g)(3))	DAE	[ ]		NI	N/A
d) For each compliance test:					

		YES	NO	NI	N/A
1) Dates of each test? (265.1064(g)(4)(I))	DAE	[ ]		NI	N/A
2) Background level measured during each test? (265.1064(g)(4)(ii))	DAE	[ ]		NI	N/A
3) The maximum instrument reading measured at the equipment during each test? (265.1064(g)(4)(iii))	DAE	[ ]		NI	N/A
e) List of all identification numbers for equipment in vacuum service? (265.1064(g)(5))	DAE	[ ]		NI	N/A
vi) A log with a list of identification numbers for the valves that are designated unsafe or difficult to monitor, an explanation stating why they are unsafe or difficult and the plan for monitoring? (265.1064(h)(1-2))	DAE	[ ]		NI	N/A
vii) For valves in gas/vapor or light liquid service with alternative standards the operating record will record: (265.1064(I))					
a) A schedule of monitoring? (265.1064(I)(1))	DAE	[ ]		NI	N/A
b) The percent of valves found leaking during each monitoring period? (265.1064(I)(2))	DAE	[ ]		NI	N/A
viii) Is the following information shall be recorded in a log and kept in the operating record: (265.1064(j))					
a) Criteria for failure of seal system indicated by sensor used w/ light liquid service pumps? (265.1064(j)(1))	DAE	[ ]		NI	N/A
b) Criteria for failure of seal system indicated by sensor used w/ compressors? (265.1064(j)(1))	DAE	[ ]		NI	N/A
c) Any changes to these criteria and the reason for change? (265.1064(j)(2))	DAE	[ ]		NI	N/A
ix) The following information kept in a log and used to determine exemptions for the hazardous waste management unit: (265.1064(k))					
a) An analysis determining the design capacity of the management unit? (265.1064(k))	DAE	[ ]		NI	N/A
b) A statement listing the hazardous waste influent to and effluent from each unit and analysis determining whether the waste is a heavy liquid? (265.1064(k)(2))	DAE	[ ]		NI	N/A
c) Up-to-date analysis/supporting data used to determine if equipment is subject to standards? (265.1064(k)(3))	DAE	[ ]		NI	N/A
d) Documentation when knowledge of the hazardous waste stream or process is used? (265.1064(k)(3))	DAE	[ ]		NI	N/A
e) Any new determinations if the owner/operator takes any action that could result in an increase of the organic content of the waste? (265.1064(k)(3))	DAE	[ ]		NI	N/A
43. Are records of equipment leak information in 265.1064(d) and closed-vent and control device information in 265.1064(e) kept 3 years? (265.1064(1))	DAE	[ ]		NI	N/A

Comments: _____

Hukill Chemical Corp. OHD001926740 May 13, 2003

Inspection Checklist for Subpart CC: Air Emission Standards (Containers)

Item # 40 CFR:

CC-1	265.1080	Do any of the following exclusions apply? If yes, please circle.	YES	NO

Applicability: The air emission requirements apply to units subject to subpart I * unless the following apply (circle if applicable):

1. Waste was placed in unit prior to Oct. 6, 1996, and none has been added since.
2. The container capacity is less than .1 cubic meter (26 gallons)
3. A unit (e.g. tank) has stopped adding waste and is undergoing closure
4. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program
5. The unit is used solely to manage radioactive mixed waste
6. The unit is regulated by and operates in accordance with Clean Air Act regulations

***Note: 1. Satellite containers are exempt 2. CESQG's and SQG's are exempt**

CC-2	265.1083	Do any of the following exemptions apply? If yes, please circle	YES	NO

General Standards: The owner/operator must control air emissions from waste management units except the unit is exempt if (please circle if applicable):

1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required)
2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable destruction or removal processes.
3. The unit is a tank used for certain biological treatment
4. The hazardous waste placed in the unit meets the LDR numerical concentration limits or has been treated using the specified LDR treatment technology (for organics)
5. The unit is a tank used for bulk feed to an incinerator and meets certain requirements

CC-3	265.1084	Waste Determination:	Determination Not Needed	Determination Needed

Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is not needed for waste managed in containers which meet standards. It may be necessary to evaluate container management prior to requiring VO concentration determination.

#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency	NA	NI	OK	DF

CONTAINER MANAGEMENT 265.1087

Level 1	Level 2	Level 3
Larger than 26.4 gallons and less than or equal to 122 gallons, or larger than 122 gallons and do not manage H.W. in light material service	Larger than 122 gallons and manage H.W. "in light material service" (definition at 265.1081)	Larger than 26.4 gallons and treat H.W. by a stabilization process
CC-4 265.1087 **Controls**		OK
One of the following: -Use containers that meet DOT requirements -Use a cover and control with no visible gaps, holes or other open spaces into the interior of the container -Use organic vapor suppression on or above the container in LAB ONLY 265.1087(c)	One of the following: -Use containers that meet DOT requirements -Use containers that operate with no detectable emissions (method 21) -Use containers that are demonstrated to be vapor-tight within the last 12 months (method 27) 265.1087(d)	-Containers used to stabilize H.W. with volatile organics greater than 500 ppm -For waste stabilized in a container either: 1.container must be vented directly to a control device; or 2.container is vented inside an enclosure which is exhausted through a closed vent to a control device -Conservation vents are not allowed 265.1087(b)(2)

Level 1			Level 2	Level 3			
#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency			NA	NI	OK	DF
CC -5	265.1087	Waste transfer requirements				OK	
No waste transfer requirements apply			-Waste transfer requirements apply regardless of container alternative used in level 2 -Transfer waste into or out of a container in such a manner as to minimize exposure of the waste to the atmosphere. Acceptable methods include a submerged fill pipe, vapor recovery system, or fitted opening with a line purge 265.1087(b)(3)	Not applicable			
CC-6	265.1087	Operating requirements				OK	
The covers, openings, and closure devices should be closed except: 1. When transferring H.W. in and out of the containers 2. between batch transfer not exceeding 15 minutes between transfer (note: if the person performing the transfer leaves the area, or the process shuts down, the container must be closed) 3. While performing sampling and equipment access 4. Conservation and safety vents are allowed -Containers may be open while performing sampling or equipment access -Safety valves and conservation vents may be used if normally left in close position -A cover need not to be on a RCRA empty container, as defined in 40 CFR 261.7 265.1087(c)(3), (d)(3)				-If the vapors are directly vented to a control device, there are specific design and operating criteria that must be met same as tanks that have closed vent and control device systems -If an enclosure is used, the enclosure must meet the design and operating criteria specified in "Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741 The container, enclosure, control device or closed vent system may have safety relief devices.			
CC-7	265.1089	Inspection requirements				OK	
Minimal inspection required: - when facility accepts container and it is not emptied within 24 hours -if wastes are stored greater than a year, then visually inspect once a year If inspections are required, facility must develop written plan and schedule to perform inspection 265.1087(c)(4), (d)(4)				Inspection requirements are the same as for tanks			
CC- 8	265.1087	Repair requirements				OK	
When a defect is detected; attempt to repair within 24 hours must be made and: 1. Repair within 5 calendar days or empty and remove the container from service 2. Do not use until defect is repaired 265.1087(c)(4), (d)(4)				Necessary corrective measures shall be immediately implemented to ensure that the control device is operated in compliance			
CC- 9	265.1090	Recordkeeping requirements				OK	
-If container exceeds 122 gallons and does not meet DOT standards, records indicating that the container is not managing H.W. in light material service			Since Level 2 waste is "in light material service", no records need to be kept	Depends upon how the organic emissions are vented: -If an enclosure is used, records must be maintained for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent total enclosure (Procedure T) -Records for the closed vent and control device system are the same for those used on tanks(265.1090)(e)			

Comments:

Inspection Checklist for Subpart CC: Air Emission Standards (Tanks)

Applicability: The air emission requirements apply to units subject to Subpart J * unless any of the following apply:

Item # 40 CFR: *Note: CESQG's and SQG's are exempt

CC-T1	**265. 1**	**Do any of the following general exclusions apply? If yes, please circle.**	**YES**	**NO**

1. Wastewater treatment units -265.1(c)(10)
2. Emergency spill management units. -265.1(c)(11)
3. Hazardous waste recycling units. -265.1(c)(6)
4. Elementary neutralization units -265.1(c)(10)
5. Totally enclosed treatment units. -265.1(c)(9)
6. Satellite accumulation areas. -265.1(c)(7) - 262.34(c)(1)

CC-T2	**265.1080**	**Do any of the following exceptions apply? If yes, please circle.**	**YES**	**NO**

1. Waste was placed in the unit prior to Oct. 6, 1996 and none has been added since. -265.1080(b)(1)
2. The unit has stopped adding waste and is undergoing closure pursuant to an approved closure plan. -265.1080(b)(3)
3. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program. -265.1080(b)(5)
4. The unit is used solely to manage radioactive mixed waste. -265.1080(b)(6)
5. The unit operates with an emission control device regulated by and in accordance with Clean Air Act regulations. -(b)(7)
6. The unit operates with a process vent as defined in 264.1031, regulated under Subpart AA. -265.1080(b)(8)

CC-T3	**265.1080(d)**	**Administrative Stay for Organic Peroxide Waste:**	**YES**	**NO**

If the unit recieves hazardous waste generated by organic peroxide manufacture, and the owner/operator has met the conditions as set forth in 265.1080(d), the requirements under Subpart CC are administratively stayed, *except for the record keeping requirements* which additionally include the notification requirement as given in 265.1080(d)(3).

CC-T4	**265.1083**	**Do any of the following exemptions apply? If yes, please circle.**	**YES**	**NO**

General Standards: The owner/operator must control air emissions from waste management units except the unit is exempt if:

1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required by 265.1084; see **CC-T5**). -265.1083(c)(1)
2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable processes. -265.1083(c)(2)
3. The unit is a tank used for certain biological treatment consistent with 265.1087(c)(2)(iv). -265.1083(c)(3)
4. The hazardous waste placed in the unit meets the LDR numerical concentration limits given in 268.40 or has been treated using the LDR treatment technology specific for the waste (specified in 268.42). -265.1083(c)(4)
5. The unit is a tank within an enclosure used for bulk feed to an incinerator and meets certain requirements. -265.1083(c)(5)

CC-T5	**265.1084**	**Waste Determination**	**Determination Not Needed**	**Determination Needed**

Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is **not** needed for waste managed in tanks which meet Subpart CC standards. It may be necessary to evaluate tank management prior to requiring VO concentration determination.

TANK MANAGEMENT

Level 1 tank controls apply only to a fixed-roof tank in which the maximum vapor pressure of organic waste is less than that below for each tank design capacity, contents are not heated above the temperature of vapor pressure determination, and nc stabilization is conducted in the tank. -265.1085(b)(1)
Tanks that exceed Level 1 criteria must use Level 2 controls; tanks that do not exceed Level 1 criteria may use Level 2 controls. The five design options for Level 2 controls are given below; vented fixed-roof tanks are the most common. -265.1085(b)(2)

Tank Design Capacity	Level 1 pressure limits	Level 1	Level 2
≥151m³ / 40,000 gal	< 5.2 kPa / 0.75 psi	Fixed-roof tanks -265.1085(c)(1) through (c)(4) -265.1085(d)	Fixed-roof tanks vented to control device -265.1085(g) External floating roof tanks - 265.1085(f) Fixed-roof with internal floating roof - 265.1085(e) Enclosure vented to combustion device - 265.1085(i) Pressure tank - 265.1085(h)
< 151 m³ and ≥ 75 m³	< 27.6 kPa / 4.0 psi		
< 75 m³ / 20,000 gal	< 76.6 kPa / 11.1 psi		

265.1085(c) Level 1 Controls for Fixed-Roof Tanks

NA=Not Applicable NI=Not Inspected OK= In Compliance DF= Deficiency

CC-T6	265.1085(c)(1)	Vapor Pressure Determination	NA	NI	OK	DF

Has the owner/operator determined the maximum organic vapor pressure of the waste in the tank: by direct measurement or by knowledge? -265.1085(c)(1) -265.1084(c)(3,4)	YES	NO
Is the determination acceptable?	YES	NO
Does waste in tank exceed vapor pressure threshold for tank size? (If yes must use Level 2 Controls)	YES	NO

CC-T7	265.1085(c)(2)	Tank Design Specifications	NA	NI	OK	DF

The fixed roof and its closure devices shall be designed to form a continuous barrier over the entire surface area of the hazardous waste in the tank; shall be installed such that ther are no visible cracks, holes, gaps or other open spaces between roof and tank wall / closure device and roof.
Inspect the fixed roof and closure devices of each tank or a representative percentage of multiple tanks; list and photograph defects at each.

Tank #	Defect(s)	Photo #	Notes
	NONE		

Is each opening in the fixed roof (sampling port, conservation vent, level indicator, safety valve, etc.): **265.1085(c)(2)(i)(A)** equipped with a closure device such that when closed there are no visible cracks, holes, gaps or other open spaces? or; **265.1085(c)(2)(i)(B)** connected via a closed vent system to a control device? (If YES see Level 2 Controls checklist below)	YES YES	NO NO

CC -T8	265.1085(j)	Waste transfer requirements	NA	NI	OK	DF

Transfer of hazardous waste to the tank from another tank subject to 265.1085 or suface impoundment subject to 265.1086 shall be conducted using continuous hard piping or other closed system,to prevent exposure of waste to atmosphere; except under conditions given in 265.1085(j)(2).

CC-T9	265.1085(c)(3)	Operating requirements	NA	NI	OK	DF

Cover and closure devices shall be closed at all times except when performing routine inspections, sampling, maintenance and cleaning. Opening of a pressure/vacuum relief valve, conservation vent or similar device is allowed during normal operations to maintain tank pressu within design specificatons. Opening of a safety device is allowed at any time.

Are pressure/vacuum relief valves and conservation vents designed to operate with NDE when secured in closed position?	YES	NO
Are the opening settings of these devices consistent with the manufacturer's recommended operating ranges?	YES	NO
What are the pressure settings of these devices and how do they compare with Level 1 vapor pressure limits?	OK	DF

CC-T10	265.1085(c)(4)	Inspection requirements	NA	NI	OK	DF

The fixed roof and closure devices shall be visually inspected for defects initially, on or before December 12, 1996, or when first in service and thereafter at least annually,according to written plan; except when unsafe, and delay conditions are met. Buried parts of tank need not be inspected
TSDs: The inspection plans must be incorporated into the overall facility inspection plan as per 265.15.

CC-T11	265.1085(k)	Repair requirements	NA	NI	OK	DF

Owner/operator shall make first efforts at repair of each defect detected during an inspection no later than 5 calendar days after detection; repairs shall be completed as soon as possible but no later than 45 calendar days after detection, except as provided in 265.1085(k)(2).

CC- T12	265.1090(b)	Recordkeeping requirements	NA	NI	OK	DF

For each unit in service records must be maintained on-site including: unique unit ID number, dimensions and capacity, organic vapor pressure of waste (if tested, records include time and date of samples, analytical method, and results), and inspection and repair records for three years.
Please list in detail below deficiencies noted regarding items CC-T6 through CC-T12:

CC- T13	265.1085(c)(2)	Level 2 Controls for Fixed-Roof Tanks * Vented to Control Device	NA=Not Applicable OK= In Compliance	NI=Not Inspected DF= Deficiency

All requirements of CC-T7 and: Each roof opening not equipped with a closure device shall be connected to a closed system that is vented to a control device which removes or destroys organics in the vent stream, and which shall be operating whenever hazardous waste is in the tank.

CC- T14	265.1085(j)	Waste transfer requirements	NA	NI	OK	DF

All requirements of CC-T8.

CC- T15	265.1085(g)	Operating requirements	NA	NI	OK	DF

All requirements of CC-T9 and: Closed vent system and control device shall be installed and operated in accordance with **265.1088**.

CC- T16	265.1085(g)(3)	Inspection requirements	NA	NI	OK	DF

All requirements of CC-T10 and: perform initial leak detection testing of closed vent system on or before date tank is subject to the rule, as per 265.1088(b)(4); annually inspect closed vent system components per 265.1033(k) and 265.1034(b); negative pressure systems per 265.1033(j)(2).

CC- T17	265.1085(k)	Repair requirements	NA	NI	OK	DF

All requirements of CC-T11.

CC- T18	265.1090(e)	Recordkeeping requirements	NA	NI	OK	DF

All requirements of CC-T12 and: maintain records of unexpected malfunctions and semiannual updates of planned maintenance operations for 3 years; also: If control device is <u>not</u> a carbon absorber, condenser, flare, process heater, boiler or thermal vapor incinerator, maintain records of proper operation and use (e.g., manufacturer's documentation). Please list in detail below deficiencies regarding items CC-T13 through CC-T18:

Waste, Pesticides and Toxics Division

Type of Document:
- ☒ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action

Facility Name : Hukill Chemical

Facility Location: 7013 Krick Road

City: Bedford **State:** Ohio

U.S. EPA ID# OHD 001 926 740

Assigned Staff Mike Cunningham **Phone:** 64464

Name	Signature	Date
Author		4-22-04
Regional Counsel	e-mail concurrence (Mike McCoy)	4-16-04
Section Chief		4-23-04
Branch Chief		

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's. Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

7001 0320 0006 1565 5649

OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

Bob Taft, Governor
Christopher Jones, Director

October 2, 2000

RE: **HUKILL CHEMICAL CORPORATION**
U.S. EPA ID: OHD 001926740
OHIO EPA ID: 02-18-0315
COMPLIANCE EVALUATION
INSPECTION RETURN TO COMPLIANCE
CUYAHOGA COUNTY

Hukill Chemical Corporation
Attn: Mr. Mike Mraz
7013 Krick Road
Bedford, Ohio 44146-4493

Dear Mr. Mraz:

Thank you for your September 13, 2000 response to Ohio EPA's July 14, 2000 Notice of Violation (NOV) letter. You submitted documentation including: a labeling schedule (Attachment A), waste minimization report (Attachment B), and discussion of the implementation of the labeling schedule as it pertains to the violations cited in the NOV.

My review of this documentation indicates that Hukill has adequately demonstrated abatement of all violations discovered during our June 29, 2000 inspection.

If you should have any questions, please feel free to call me at (330) 963-1258.

Sincerely,

Joseph C. Loucek, III
Environmental Specialist
Division of Hazardous Waste Management

JCL:cl

cc: Harriet Croke, Region V, USEPA
Frank Popotnik, DHWM, NEDO
Linda Neumann, DHWM, CO

UNMANIFESTED WASTE REPORT

DATE RECEIVED: 7-15-98 DATE IDENTIFIED AS HAZARDOUS: 7-22-98

DATE SUBMITTED TO DIRECTOR VIA REGULAR MAIL: 7-29-98

FACILITY INFORMATION

FACILITY EPA I.D.# OHD066060609

FACILITY NAME: CHEMTRON CORPORATION

FACILITY ADDRESS: 35850 SCHNEIDER COURT

AVON, OH 44011

GENERATOR INFORMATION

GENERATOR EPA I.D. # OHD 004171724

GENERATOR NAME: C.C. Custom Technology

GENERATOR ADDRESS: 18201 South Miles Rd
Cleveland, OH 44128

TRANSPORTER INFORMATION

TRANSPORTER EPA I.D.# OHD004171724

TRANSPORTER NAME: C.C. Custom Technology

TRANSPORTER ADDRESS: -Same-

QUANTITY AND DESCRIPTION OF WASTE: 1-drum - Butyl Propasol

METHOD OF TREATMENT: M061 - fuel blending

EXPLANATION WHY WASTE RECEIVED UNMANIFESTED: after analysis @ Chemtron, material found to have flash point <140°F.

ADDITIONAL EPA CODES: D001

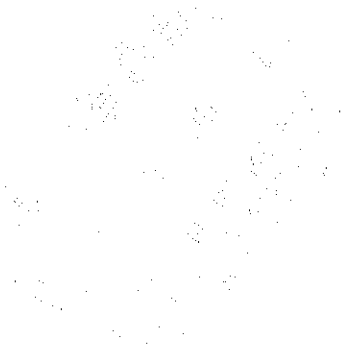
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of find and imprisonment.

Ronald J. Guenther

Signature (Owner, Operator or Authorized Representative)

Distribution: 1-USEPA or State Env. Office of Generator, 1-OEPA Director, 1-Generator, 1- T.S.D.F.

F012:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DRE-8J

NOV - 7 1996

Mrs. Marlene Emanuelson
Ohio Environmental Protection Agency
Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087-1969

RE: Joint Inspection
OHD 001 926 740

Dear Mrs. Emanuelson:

I would like to extend my appreciation to you for your support during my visit to the Northeast District Office. I appreciate that you were taking the time to provide insight and assistance, as needed, during the joint inspection conducted during my stay on August 26 and 27, 1996.

I am forwarding a copy of the inspection findings regarding the Subpart AA and BB air emission standards for the Hukill Chemical facility. I have received a copy of your letter to the facility of September 17, 1996, describing the findings. Again, thank you for all the cooperation provided.

Sincerely yours,

Gertrud Matuschkovitz

Gertrud Matuschkovitz
RCRA OH/MN Enforcement Branch

Joint Inspection Report

Facility Name: Hukill Chemical Corporation located at
7013 Krick Road
Bedford, Ohio 44146

Type of Facility: Treatment and Storage

Identification Number: OHD 001 926 740

Date of Inspection: August 26, and 27, 1996

Facility Representative: Mike Mraz and Ed Price

Name of State Inspector: Marlene Emanuelson, OEPA

Name of U.S. EPA inspector: Gertrud Matuschkovitz

Type of Inspection: Compliance Evaluation Inspection (CEI), and monitoring, record keeping, and reporting requirements of air emisions from process units and vents under 40 CFR 264 or 265, Subpart AA and BB.

Joint Inspection Report

Facility Name: Hukill Chemical Corporation located at
7013 Krick Road
Bedford, Ohio 44146

Type of Facility: Treatment and Storage

Identification Number: OHD 001 926 740

Date of Inspection: August 26, and 27, 1996

Facility Representative: Mike Mraz and Ed Price

Name of State Inspector: Marlene Emanuelson, OEPA

Name of U.S. EPA inspector: Gertrud Matuschkovitz

Type of Inspection: Compliance Evaluation Inspection (CEI), and monitoring, record keeping, and reporting requirements of air emmisions from process units and vents under 40 CFR 264 or 265, Subpart AA and BB.

Summary of Inspection Evaluation

General description

Hukill Chemical Corporation has two process vents as defined by the air emission standards rule. The fractional distillation operation, referred as the batch distillation unit, has one vent where the system can vent to the atmosphere, through a vent tank equipped with a conservation vent. The second process vent is the combined vent for the two Luwa thin film evaporators. These units are operated under vacuum. Each Luwa unit is equipped with a vacuum pump which exhausts into a header system where the emissions from both units are combined.

The feed streams for the distillation units are 95 to 100 percent organics. Both process vents are subject to the regulations since the streams contain more than 10 ppmw organics. These organics are usually more than 20 percent "light liquids". The total organic emissions from these process vents are below 3 pounds per hour or 3.1 tons per year.

The pumps, valves and lines used at Hukill for hazardous waste transfer are all in light liquid service. The identification of the pumps and valves are provided on the leak detection monitoring data sheet. Open ended lines or valves were capped when not in use.

Inspection and Monitoring

A draft permit was sent to U.S. EPA for review. The inspection check list provides for the daily inspection of pumps and valves and lines used in the transfer of hazardous waste. Pumps are monitored on a monthly basis using Method 21 for organic emissions. Valves are monitored quarterly if no leaks are detected for two successive months.

Hukill has installed a low cooling water flow alarm for the distillation unit to mitigate the effects of a cooling water line rupture or power outage in case it happens. There is also a high temperature sensor for the distillation unit installed with a set point. The set point is set below the vapor temperature of the solvent. When the set point is reached an alarm sounds in the operating area and the lab and gives sufficient response time to take proper actions to avoid air emissions.

The Luwa thin film evaporator units are able to shut down when the power is interrupted. These units are under vacuum from electric operated vacuum pumps. When the power is interrupted the conditions for creating a vent emission are eliminated.

The equipment which mitigates the effects of equipemt failure and power outage also prevents releases to the atmosphere. Records including the process vent test data and equipment leak detection monitoring data are maintained in the facility operating record for a minimum of three years.

Personnel training in the safe handling of hazardous wastes and the proper use of personal protective equipment is ongoing and is periodically evaluated by the Ohio Environmental Protection Agency which was authorized to perform this task.

The distillation unit was first tested December 13, 1990, by a consulting firm Envisage Environmental, Inc. The unit was just recently tested July 26, 1996, by the same contractor. The results of the test indicated that no leaks were detected and no organic emissions occurred during normal operations. The estimated annual distillation time for this unit is based on scheduled operation of 24 hours per day, six day a week for 50 weeks a year. Distillation time for this unit is 80 percent of scheduled time. This gives an estimated distillation time of 5760 hours per year.

The two Luwa units were tested using Method 18. The estimated annual distillation time for the Luwa units is based on scheduled operation of 24 hours a day, six days a week for 50 weeks a year. Distillation time for these units is 75 percent of scheduled time. This gives an estimated distillation time of 5400 hours per year. The calculated annual organic emission from this vent, based on 5400 hours per year distillation time, is 1.82 tons per year.

Based on the above information the total organic air emissions from all effected process vents at the Hukill facility are below the 3 pounds per hour or 3.1 tons per year level. Therefore, Hukill Chemical is not required to provide additional control devices to further reduce process vent emissions.

In walking through the facility no leaks from pumps or valves were detected. The records indicated that in case a leak occurred it was noted on the monitoring sheet and repaired. The facility representative was advised that it would be helpful in the monitoring data sheet to find the dates after a repair was completed in a separate column to have a fast overview for the staff or any inspector to see whether the repair was accomplished in a reasonable time.

The facility still has an interim permit and is at this time not yet required to report to the Regional Administrator of the U.S. EPA semiannually in case a leak is not repaired within a prescribed time.

No indication of any violations were noted in the monitoring or record keeping of air emissions from process units and vents under 40 CFR 265, Subpart AA and BB. The only concern that was noted by the inspector of the OEPA was a possible problem with the set-a-flash equipment which seemed to have misfunctioned on a load of non-hazardous waste water. It was suggested that the equipment be repaired or replaced in order to avoid false readings in the future.

The facility is also making efforts in upgrading their lab facilities in the future, since the sensitive equipment in the lab may pick up trace elements from the plant atmosphere and interfere with lab results.

With respect to the State inspector, Marlene Emanuelson, was well prepared and knowledgeable about the applicable regulations. She was very thorough in all her activities of the walk through the plant and meticulous in searching for the proper records. She was helpful in locating the records in the facilities computer tracking system as well as the hard file copies. Due to her efforts the facility is very cooperative in meeting all the compliance requirements.

Mike Mraz, Edgar Price } Hukill representatives

3. Air Emissions Checklist

		Yes	No
Section A - Applicability (§§264/5.1030)			
1.	Does the facility have units permitted under Part 270 or is it permitted under Part 270?	✓	Draft permit at U.S. EPA
a.	What is the effective date for this facility? 12/1990		
b.	For interim status facilities, have these requirements been incorporated into Part B application submittal?	✓	
2.	Are there any of the following separation processes at the facility:		
a.	Distillation?		✓
b.	Fractionation?	✓	
c.	Thin-film evaporation?	✓	
d.	Solvent extraction?		✓
e.	Air stripping?		✓
f.	Steam stripping?		✓
Section B - Waste Streams			
3.	Are there waste streams associated with any separation processes that contain 10 ppmw or greater organic concentration? (§§264/5.1032(a))	✓	
a.	If they claim waste streams below 10 ppmw, did they use proper means to determine concentration? (§§264/5.1034(d)(1 or 2))		NA
b.	Was date of initial determination before their effective date? (§§264/5.1034(e))	✓	
c.	Were other analyses performed annually or upon changes in waste streams? (§§264/5.1034(e)(2 or 3))		NA
Section C - Facility Emissions Rates			
4.	Is the hourly process vent organic emission rate greater than or equal to 3 lb/hr? (§§264/5.1032(a))		✓
	Is the yearly process vent organic emission rate greater than or equal to 3.1 tons/yr? (§§264/5.1032(a))		✓

		Yes	No
a.	If performance tests were made, were they done according to §§ 264/5.1034(c)?	✓	
b.	If engineering calculations were used, were they done according to §§ 264/5.1035(b)(2)(ii)?	✓	
c.	Has the owner/operator signed a statement that test conditions portray peak capacity operating conditions? (§§264/5.1035(b)(4)(iv))	✓	
d.	Were the facility emissions rates determined by the effective date?	✓	

Section D - Facility Emission Rates After Control Devices or Change in Operations

no change in operation

5.	a.	Are the process vent organic emission rates for the facility less than or equal to 3 lb/hr and less than or equal to 3.1 tons/year or are they reduced by 95%? (§§264/5.1032(a))	NA	
	b.	If performance tests were used, were they done in accordance with §§264/5.1034(c) and was the test plan in accordance with §§264/5.1035(b)(3)?		
	c.	If engineering calculations were used, were they in accordance with §§264/5.1035(b)(4)?		
	d.	For facilities without the control devices installed, do they have an installation plan? ((§§264/5.1033(a)(2) and 264/5.1035(b)(1))		
	e.	Will the control devices be installed by 18 months after the effective date? (§§264/5.1033)		

Section E - Reporting (§264.1038)

6.		For facilities with final permits incorporating this rule, have they sent in semi-annual reports of exceedances lasting longer than 24 hours?	NA	

(Use individual control device worksheets to continue inspection)

Summary Sheet for Control Devices (CD)

Vent #: Control Device CD #: On Unit #: For Vent #:

	Condenser for two Luwas			
NA	Adsorber (Regen)			
NA	Adsorber (Nonreg)			
NA	Process Heater			
NA	Boiler			
NA	Catalytic Vapor Incinerator			
NA	Thermal Vapor Incinerator			
NA	Air-Assisted Flare			
NA	Steam Assisted Flare			
NA	Nonassisted Flare			

Checklist
Condenser
Parts 264/265 Subpart AA

1. Operating Parameters:

List the operating parameters and the limits set for each condenser in the permit, or for interim status facilities, the limits the facility gave based on their engineering calculations (§§264/5.1035(b)(4)(iii)(E)) or performance tests (§§264/5.1035(b)(2)(ii)).

Operating Parameter	Limit	Have they met these limits?
condenser for two LWAS		

	Yes	No
Is all design documentation, monitoring, operating, and inspection information in the facility operating record? (§§264/5.1035(c))	✓	

2. Monitoring: A and either B or C

A.	Flow indicator (§§264/5.1033(f)(1))		
1.	records hourly		✓
2.	installation point correct		✓
3.	daily inspection (§§264/5.1033(f)(3))		✓
AND			
B.	[Organic compound] in condenser exhaust vent stream		
1.	continuously record (§§264/5.1033(f)(2)(vi)(A))		✓ NA
2.	daily inspection (§§264/5.1033(f)(3))		✓ NA
OR			
C.	Temperature monitoring device (§§264/5.1033(f)(2)(vi)(B))		
1.	continuously record		
2.	two locations:		
a.	exhaust vent stream from condenser	NA	
b.	coolant fluid exiting the condenser	✓	
3.	accuracy:		
a.	+/- 1% of temperature being monitored in CO		
	OR		
b.	.5 degrees C (whichever is greater)		✓
4.	inspect daily (§§264/5.1033(f)(3))		✓

3. Repair:

a.	immediately upon daily inspection (§§264/5.1033(f)(3))	✓	

		Yes	No
4.	**Exceedances** (§§264/5.1035(c)(4)(vi or vii)):		
a.	If monitoring [organic] in exhaust:		
1.	when [organic] greater than 20% above design outlet [organic]	NA	
b.	If monitoring T:		
1.	either T exhaust greater than 6 deg above design avg exhaust T OR		
2.	T coolant out greater than 6 deg above design avg coolant T		
c.	Cause of exceedance given		
d.	Measure taken to correct cause provided		
5.	**Closed-vent systems associated with the control device (§§264/5.1033(j)):**		
a.	Standard: No detectable emissions and no visual emissions	✓	
b.	Monitor: At facility effective date		
	Annually	✓	
	RA requested times		
c.	Repair: Start by 5 days/complete by 15		

Identification of Equipment Covered by Rule

Equipment	Equipment ID #	Waste Stream #	Fluid
Pumps	see leak detection monitoring data sheets		
general	no leaks detected at any pumps or valves,		
dual mechanical	at time of test and time of inspection		
NDE (sealless)			
closed vent/control devices			
Compressors			
general			
NDE Sealless			
CV/Control Devices			
Pressure Relief Devices			
general			
CV/Control Devices			
Sampling Connecting Systems			
general			
insitu			
Valves			
general			
leakless (NLE)			
unsafe to monitor			
difficult to monitor			
alter allowable %			
alter skip period LDRP			
Open-ended valves or lines			
Flanges and other connectors			

Date of Inspection: August 26, 1996
Facility: HUKILL Chemical
Inspector: Gertrud Matuschkovitz

RECORDKEEPING REQUIREMENTS (§§264/5.(b)(1) and (g))

Unit Number Listed	Two Luwas and one distilation unit not numbered
Equipment Identification Number Listed	all feed pumps numbered
Location at Facility	Distillation Area
Type of Equipment	Batch Distillation
% by weight of TOC at equipment	more than 10 ppmw
Fluid State at Equipment	Light liquid
Equipment Designation	
If Closed-Vent/Control Device Used (264/5.1064(b)(2-4)	
— Implementation Plan	contingency plan
— If testing: performance test plan	yearly by Envisage Environmental
— Design Documentation or Perf. Test Results	July 26, 1996
If Control Device; monitoring, operating, inspection data (264/5.1064(e))	documentation was presented

LEAK DETECTION AND REPAIR RECORDKEEPING (§§264/5.1064 (c and d))

Monitoring Equipment Number	Equipment identified
Monitoring Operators Identification	Operator also identified
Date of Visual, Audible, Olfactory Indication of Leak	No leaks detected; date for leak test incorporated
Date of Leak Detection	indicated in comment section
Date of Repair Attempt	put in by owner from work order
Repair Methods at each attempt	indicated what was done
Leak "Above 10,000" or Above 500 above background	NA
"Repair Delayed" if after 15 days	NA
If valve, documentation for repair delay	NA
Signature of Person approving delay	NA
Expected Date of Repair	NA
Date of Successful Repair	NA

PHYSICAL INSPECTION

Visual, Audible, or Olfactory Indication of Leak	contracted by Envisage Environmental No indication of leaks, no tags,
Monitoring Equipment Number	
Correct Calibration Method	
Correct Monitoring Techniques Used	
Method 21 Results	
Tag on Leaking Equipment	Not applicable, tag done by consultant
If Equipment already had tag on it:	
— Date Leak Detected	NA
— Date of Expected Repair or Actual Repair	NA
Equipment Marked as Being in this Program	NA

OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office
2110 E. Aurora Road
[illegible]nsburg, Ohio 44087-1969
425-9171
(216) 487-0769

George V. Voinovich
Governor

Uy/aine FYI

February 23, 1995

RE: HUKILL CHEMICAL CORP.
OHD 001 926 740
#02-18-0315

CERTIFIED MAIL

Mr. Michael Mraz
Plant Manager
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146-4493

Dear Mr. Mraz:

Ohio EPA is in receipt of, and has reviewed, Hukill Chemical Corporation's (HCC) November 16, 1994, response to Ohio EPA's October 14, 1994, notice of violation letter (NOV). Ohio EPA shall respond to HCC's submittal in the same order as the violations were presented in the October 1994, NOV:

1. OAC Rule 3745-66-93(C)(1)(2)(3)(4) and (E)(1)(c)(e)(f): Containment and detection of releases;

   (This violation is applicable only to the four, 3,000 gallon "feed" tanks).

   HCC has submitted the requested calculations. The calculations appear to indicate that the containment system found in the distillation area of the facility is placed upon a foundation or base capable of providing support for the four (4) tank systems, as is required by OAC Rule 3745-66-93(C)(2). Based on the aforementioned calculations and the Professional Engineer's certification provided in an earlier submittal, it appears that HCC has abated this portion of the violation.

   HCC has elected to build a carbon steel tank dike in lieu of meeting the secondary containment coating standards. In your letter you state that HCC has proposed a June 1995 deadline for installation of the tank dike. Please note, that until such time as the carbon steel dike for the four 3,000 gallons tanks is installed, HCC will remain in violation of OAC Rule 3745-66-93(C)(1)(4) and 3745-66-93(E)(1)(a) through (f). Ohio EPA will allow the violation to remain outstanding through June 1995. Please note, however, that the tank dike must be installed and certified by that deadline.

2. OAC 3745-66-92(A)(B) and (G): New tank system requirements; (This violation was incorrectly labeled as violation #3 in the October 1994 NOV).

HCC has submitted additional calculations/explanations to supplement the original tank assessments (tank V-6000 C, four 3,000 gallon feed tanks, and Disperser Tank) provided to Ohio EPA at the time of the September 1994 compliance evaluation inspection. HCC has failed to provide the following, as is required by OAC Rule 3745-66-92(B):

> The owner or operator of a new tank system must ensure that proper handling procedures are adhered to in order to prevent damage to the system during installation. Prior to covering, enclosing, or placing a new tank system or component in use, an <u>independent</u>, qualified installation inspector or an <u>independent</u>, qualified, registered professional engineer, either or whom is trained and experienced in the proper installation of tank systems, must inspect the system or component for the presence of any of the following items: weld breaks, punctures, scrapes of protective coatings, cracks, corrosion, and other structural damage or inadequate construction or installation.

Your letter states "No written statements or contracts exist for the installation of these tanks. The tanks have been in service for at least several years with no apparent problems structurally". (Specifically, you were referring to the V-6000 C and the four 3,000 gallon tanks).

HCC is unable to provide the Ohio EPA with an installation inspection of these tanks by an independent party, as is required by this rule. Ohio EPA will, however, return HCC to compliance with this rule, since as you stated, the tanks have been in use for several years without incident, HCC feels confident that HCC Maintenance personnel are experienced in tank installation, and no written statements exist for the installation of the tanks. In the future, HCC must meet the aforementioned requirement prior to placing any hazardous waste tanks into service at the facility.

Regarding the Disperser Tank, HCC has not provided any calculations which support the claim that the Disperser Tank has sufficient structural strength to ensure that it will not collapse, rupture or fail during fuel blending activities. Your letter states, in part, that "the 1,000 gallon Disperser Tank was built for high shear mixing forces. The 1/4 inch thick shell is certainly strong enough to hold the weight of the full tank of liquid. The Professional Engineer's signed statement, dated August 1, 1994, for the certification of the support slab and the 1,000 gallon Disperser Tank was provided in the draft tank assessments submitted to you".

Ohio EPA had previously reviewed the draft tank assessments provided by HCC for the Disperser Tank, but requested the additional calculations in it's October 14, 1994 NOV because HCC has never provided calculations to show that the Disperser Tank has the structural integrity to carry the load. The tank was visibly assessed on August 1, 1994, by Mr. Stanley Haw, P.E., who states in his certification that, "The vessel and its support slab were evaluated and found to be structurally adequate for its present service." Although I discussed the ability of the Disperser Tank to handle the high shear mixing forces for which is was made with Mr. Haw, the calculations he based his certification upon, or the rational he used to base his decision on, should have been provided in writing.

In summary, HCC has provided a written certification for the Disperser Tank based upon a registered professional engineer's visual observations/assessments of the tank while in service. Ohio EPA will accept the P.E.'s certification that the tank will not collapse, rupture or fail when in use, and that the vessel is capable of performing the duties for which it has been placed into service.

Based upon the calculations provided, brief explanations, and the signed Professional Engineer's certifications previously submitted, it appears that HCC has abated the above cited violation first noted in Ohio EPA's October 14, 1994 NOV, for tanks V-6000-C, the four 3,000 gallon tanks, and the Disperser Tank.

Please provide a time line that will be followed for installation of the new tank dike within forty-five (45) days of receipt of this letter.

Should you have any additional questions, please do not hesitate to call me at (216) 963-1162.

Sincerely,

Marlene M. Emanuelson

Marlene M. Emanuelson
Environmental Scientist
Division of Hazardous Waste
Management

MME/fwn

cc: Frank Popotnik, DHWM, NEDO
Laurie Stevenson, DHWM, CO
Gertrude Matuschkovitz, U.S. EPA
Gordon Garcia, U.S. EPA
Robert Hukill, President
Edgar Price, Engineering Consultant

OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087-1969
(216) 425-9171
FAX (216) 487-0769

George V. Voinovich
Governor

Harriet - FYI
Wayne section has copy. Some permit issues.

October 14, 1994

RE: HUKILL CHEMICAL CORP.
OHD 001 926 740
#02-18-0315

CERTIFIED MAIL

Mr. Robert L. Hukill
President
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146-4493

Dear Mr. Hukill:

On September 13 and 14, 1994, the Ohio Environmental Protection Agency (EPA), Division of Hazardous Waste Management, conducted a compliance evaluation inspection of the Hukill Chemical Corporation (HCC), located at 7013 Krick Road, Bedford, Ohio. The purpose of the inspection was to evaluate the facility for compliance with state and federal hazardous waste regulations. The Ohio EPA was represented by Laurie Stevenson and me. HCC was represented by Ed Price, Mike Mraz and you. I have enclosed copies of the inspection checklists for your records.

As part of this inspection, Ohio EPA will be evaluating six tank systems for compliance with Ohio Administrative Code (OAC) rules 3745-66-92 and 3745-66-93 (OAC 3745-55-92 and 3745-55-93). These tanks are: tank V-6000C, "distillation area" tanks 8-3-F, 9-3-F, 10-3-F and 11-3-F, and the 1,000 gallon Disperser Tank.

The "F" tanks are currently being used as hazardous waste process tanks for the reclamation of solvents. HCC has included these tanks in its Part B Permit application such that they may be used as permitted hazardous waste storage tanks upon journalization of the permit.

Recent changes in regulatory interpretation now require that the Disperser Tank be included as a permitted storage tank in the Part B Permit application.

HCC has always considered tank V-6000C to be a generator tank. However, Ohio EPA has determined, based upon its last inspection and subsequent discussions with HCC, that tank V-6000C has in fact been used, and continues to be used, as an interim status storage tank. Therefore, at the request of Ohio EPA, tank V-6000C has been included in the facility's Part B Permit application.

The following violations of the tank regulations were noted after reviewing the tank assessments submitted by HCC:

1. OAC Rule 3745-66-93(C)(1)(2)(3)(4) and (E)(1)(c)(e)(f): Containment and detection of releases;

   (This violation is applicable only to the four F tanks).

   The four F tanks are located in the distillation process area. The room itself meets the minimum requirements for a secondary containment system due to the presence of the following elements: perimeter curbing, trenches with dry sumps, and sloped ramps in each of the doorways. (HCC plans on installing a new containment dike around the tanks in the future).

   The following standards for secondary containment have not been met:

   a) A statement stating whether or not the concrete liner is free from cracks and gaps has not been provided;

   b) the installation of chemically resistant water stop joints needs to be addressed;

   c) a compatible interior coating or lining to prevent migration of waste into the concrete must be applied;

   d) proof that secondary containment has been constructed or lined with compatible materials of sufficient strength to prevent failure;

   e) calculations that indicate that the containment system is placed on a foundation or base capable of providing support must be provided;

   f) the secondary containment system must be provided with a leak detection system that is able to detect failure of primary or secondary containment; and,

   g) evidence that the containment is sloped or designed to drain and remove liquid must be provided.

HCC has stated that a new containment dike will be installed around the existing tanks to meet all of the secondary containment requirements. To abate the violation, please provide a timetable for the construction of the new containment dike or, if HCC should choose to use the current containment in place, a workplan addressing how the secondary containment currently in place will be modified to meet the requirements of the above cited rule.

3. OAC 3745-66-92(A)(B) and (G): New tank system requirements;

The owner operator must obtain a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste. The assessment must include consideration of the design standards of the system as well as design considerations to ensure that the tank foundations will maintain the load of a full tank. Additionally, the facility must have on file the written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly designed and installed.

The tank assessments provided by HCC do not meet the requirements of the above cited rule. To abate the violation, please provide;

a) the calculations which clearly illustrate that the tanks as constructed/designed have the structural strength necessary to withstand their maximum anticipated loads;

b) calculations showing the maximum load(s) placed on/through each tank leg/support and verification of the leg's/support's ability to withstand them;

c) calculations which clearly illustrate that the foundations and/or concrete slabs which support the tanks have been designed to withstand the maximum load(s) generated;

d) manufacturer's specifications that illustrate that the thicknesses of the tanks, as tested ultrasonically, exist within acceptable ranges and/or maintain an appropriate factor of safety. If the requested specifications no longer exist, provide calculations used to justify that present wall thicknesses are adequate;

e) written statements by those persons who supervised installation, or certified design of the new tank system, that the tank system was properly designed and installed; and,

f) for all outdoor hazardous waste storage tanks, calculations must be provided which clearly illustrate that the effects of freeze/thaw cycles will not negatively impact the integrity of said structures (i.e. tanks, tank bases, foundations, etc.).

For the V-6000C tank, if the requested information can be found within the Part B permit application, please refer to which section and page the information is presented. Please note, the assessments required for the tanks and secondary containment systems will need to be included in the Part B Permit application.

The following areas of concern were noted by Ohio EPA and discussed during our exit meeting:

1. Proper aisle space in the East Warehouse;

   Empty drums whose contents had been processed through the disperser unit were being stored next to 55-gallon drums of hazardous waste. The close proximity of these empty drums to the hazardous waste did not allow for proper aisle space, as is required by the Ohio Administrative Code (OAC) Rule 3745-65-35. Upon Ohio EPA's request, HCC moved the empty drums and proper aisle space was restored to the container storage area.

2. Management of satellite accumulation drums;

   A satellite accumulation container is used in the solvent processing area to catch "drips" from the solvent recycling equipment. At the time of the inspection, one satellite container was being used to catch "drips" and a second was full.

   OAC rule 3745-52-34(C) details the satellite accumulation rules. One of the requirements for a satellite accumulation area is that quantities of waste accumulated do not exceed 55 gallons at any time. HCC is not being found in violation of this rule because a facility has up to 72 hours to remove a satellite drum from an area when the quantity limit is reached. Upon accumulating 55-gallons of waste, the container must be marked with the date the excess began accumulating. This was done by HCC, as noted by the drum being labeled with a start date of September 12, 1994. I have enclosed a copy of the satellite accumulation rule for your records.

3. Accumulation of precipitation in secondary containment systems;

Precipitation had collected in the F-1 tank dike and in the hazardous waste solvent storage tank dike. Ohio EPA was informed that the water would be pumped from these secondary containment systems into a tank and analyzed prior to its disposal.

Ohio EPA was asked if there was a time limit on how long the material could accumulate within the secondary containment before it had to be removed, containerized, and analyzed. Per OAC rule 3745-66-93(C)(4), spilled or leaked waste, and accumulated precipitation, must be removed from the secondary containment system within twenty-four hours, or in as timely a manner as is possible if the removal cannot be accomplished within the twenty-four hour time period. Please be advised that the corresponding facility standard, OAC rule 3745-55-93(C)(4), which is applicable to permitted facilities, states that accumulated material must be removed within twenty-four hours, or in as timely a manner as possible if the owner or operator can demonstrate to the director that removal of the released waste or accumulated precipitation cannot be accomplished within the twenty-four hour time period.

4. Standards applicable to marketers of hazardous waste fuel;

Review of the following manifests revealed that HCC has shipped hazardous waste to a commercial hazardous waste incinerator:

MANIFEST	DATE
30768	8/26/94
30628	5/27/94
30572	4/18/94
30569	4/15/94
30566	4/15/94
30471	2/21/94

Ohio EPA has reviewed the manifest and the corresponding tank records that indicate which tanks were pumped for hazardous waste fuel shipments. Records that Ohio EPA has reviewed do not clearly indicate if this material was processed as hazardous waste fuel prior to its shipment to the incinerator or if the material was simply "brokered" through the facility.

HCC must insure that hazardous waste fuel is burned in appropriate devices as defined in OAC rule 3745-58-42(B). All bulk hazardous waste fuel must go to an appropriate facility and not to a commercial hazardous waste incinerator. If HCC wishes to be considered a hazardous waste fuel blender and marketer and enjoy the current exemption from regulation as a treatment facility, then HCC must ship only to an appropriate facility.

5. Storing hazardous wastes in process tanks;

Review of the manifests that accompanied hazardous waste to a commercial incinerator also revealed that hazardous waste was off-loaded into the unpermitted storage tank 9-3-F. Manifest #30628 and its accompanying "H.W. Fuels Shipment #3" paperwork indicate that hazardous waste was pumped from the 9-3-F tank on May 25, 1994, into a tanker truck. Information which would indicate that this hazardous waste had been, or was going to be, processed for solvent reclaim was not found.

By letter dated June 16, 1994, HCC responded to Ohio EPA's letter of May 27, 1994 which was a summary of an April 22, 1994 meeting between HCC and Ohio EPA where the status of the F-series tanks was discussed.

Because HCC did not receive the May 27 summary letter from Ohio EPA which specifically addressed the manner in which the F tanks could be used as process tanks, until two days after HCC appeared to use the 9-3-F tank for the storage of hazardous waste, HCC will not be found in violation of storing hazardous waste in an unpermitted storage tank. Should this happen in the future, HCC will be found to be in violation of the Ohio Revised Code for storing hazardous waste in an unpermitted storage tank.

Note, HCC has not been returned to compliance for the following violation, outlined in Ohio EPA's April 20, 1994, notice of violation letter to HCC:

1. Ohio Revised Code (ORC) Sections 3734.02 (E) and (F): Establishing a storage area without a permit by storing hazardous waste in an unpermitted area of the facility.

On October 8, 1994, HCC implemented closure activities for the unpermitted container storage area. Upon Ohio EPA's review and approval of the documents pertaining to this closure, HCC will receive a letter from Ohio EPA, Northeast District Office, returning them to compliance with the outstanding violation.

Please respond to the violations listed within thirty days receipt of this letter. Failure to list specific deficiencies that may have been overlooked in this communication does not release HCC from compliance with all applicable hazardous waste regulations. Please be advised that past or future instances of non-compliance can continue as subjects of pending or future enforcement actions.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (i.e. source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image by implementing pollution prevention programs. For more information about pollution prevention including fact sheets or the U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92/088), please contact the Ohio EPA's Pollution Prevention Section at (614) 644-3469.

Should you have any questions, please do not hesitate to call me at (216) 963-1162.

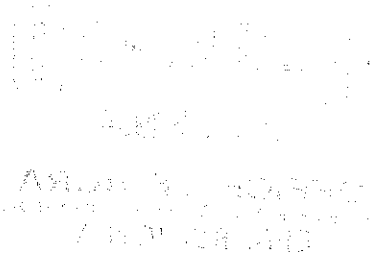
Sincerely,

Marlene M. Emanuelson

Marlene M. Emanuelson
Environmental Scientist
Division of Hazardous Waste
Management

MME/fwn

cc: Frank Popotnik, DHWM, NEDO
Laurie Stevenson, DHWM, CO
Gertrude Matuschkovitz, U.S. EPA
Gordon Garcia, U.S. EPA
Mike Mraz, Plant Manager
Edgar Price, Engineering Consultant



OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087-1969
(216) 425-9171
(216) 487-0769

TO GO ON: ✓ RCRIS __ FO LOG __ USEPA LOG __ CJ LOG __ FILE
ENTERED: ✓ RCRIS __ FO LOG __ USEPA LOG __ CJ LOG ONLY
RCRIS ENTRY CODES: (EVALULATION) 023 (ENFORCEMENT) 022
CEI ✓ CI __ OTHER _____ INITIAL NOV __ FOLLOW-UP NOV __
FULL RTC __ PARTIAL RTC __ LOR __ SENT TO USEPA: YES __ NO __
TRACKING - DHWM, CM&ES

George V. Voinovich
Governor

April 20, 1994

RE: HUKILL CHEMICAL CORP.
OHD 001 926 740
#02-18-0315

CERTIFIED MAIL

Mr. Robert L. Hukill
President
Hukill Chemical Corporation
7013 Krick Road
Bedford, Ohio 44146-4493

Dear Mr. Hukill:

On March 10, 14, and 15, 1994, the Ohio Environmental Protection Agency (EPA) conducted a compliance evaluation inspection of the Hukill Chemical Corporation (Hukill), located at 7013 Krick Road, Bedford, Ohio. The purpose of the inspection was to evaluate the facility for compliance with state and federal hazardous waste regulations. The Ohio EPA was represented by Marlene Emanuelson, Adrienne LaFavre, and Carolyn Reierson. Hukill was represented by Ed Price, Mike Mraz and you. I have enclosed copies of the inspection checklists for your records.

Hukill Chemical Corporation is a chemical distribution center and solvent recovery facility. Solvent waste streams are recycled back to the customer as distilled solvent, as well as being blended into a hazardous waste fuel which is shipped off-site for use as a supplemental fuel in cement kilns. Hukill has submitted a Part B permit application for storage of hazardous waste in containers and tanks prior to recycling activities.

Due to recent changes in the Ohio EPA's interpretation of treatment, a great deal of time was spent during this inspection discussing the facility's hazardous waste recycling and fuel blending operations, specifically, processing of the wastes prior to recycling via one of two thin film evaporators (Luwa) or a fractionating column. A summary of Hukill's processes from those discussions follows:

> Wastes are accepted on-site in drums or pumped from tanker trucks. Liquid drummed wastes are pumped into "process" tanks prior to reclaim. Drummed sludges are processed by means of a dispersion unit (the Hochmayer) which separates them into a dispersable (i.e. pumpable) material and a non-dispersable solid. The non-dispersable solids are shipped to another TSD that "packages" the solids prior to disposal in a cement kiln. Pumpable sludges are blended into chem fuel, which is burned in cement kilns as a supplemental fuel.

Liquid bulk materials are off-loaded into various permitted tanks and unpermitted "24 Hour Hazardous Waste Storage Tanks". Additionally, some of the unpermitted tanks receiving wastes are considered "process" tanks and as such, are considered by Hukill to be exempt from permitting requirements. The wastes are pumped from the storage tanks to either the Luwa's or the fractionating reboiler, depending on the purity of the waste being processed.

Water may phase separate from the spent solvents being stored in tanks. The water is pumped to one of the permitted tanks in the East Pad tank farm. The water is then processed through the frac column to reclaim any solvents which may be present. The processed water is shipped off-site to Research Oil (contains F codes) or Clean Harbors (D wastes which have lost their characteristic). Water is not decanted from any drummed hazardous wastes. Water that may phase separate within the drums is a small percentage of the total volume, thus it does not affect the BTU value of the chem fuel.

There are a number of unpermitted tanks used for the storage of hazardous waste prior to reclaim. I was told by representatives of Hukill that these tanks are not permitted because of the "24 hour storage rule", i.e., if the waste is stored in the tank for 24 hours or less prior to recycling, a storage permit is not necessary for that tank. The Ohio EPA has a number of questions and concerns regarding these unpermitted "process" storage tanks which will be addressed under separate cover.

The following violations were noted during this inspection:

1. Ohio Revised Code (ORC) Sections 3734.02 (E) and (F): Establishing a storage area without a permit by storing hazardous waste in an unpermitted area of the facility.

   During the facility walk-through, roughly 401 drums were discovered being stored/staged in an unpermitted storage area behind the truck loading dock and in the "Flammable Liquids Container Storage Area" located directly behind the loading dock. Of these drums, 115 had been received within 48 hours and were considered to be in the "acceptance phase" prior to being placed in the permitted drum storage area. The remaining drums were considered to be illegally stored in an unpermitted area of the facility. The illegal storage was considered to have occurred from at least February 15, 1994 (drums dated as such in the unpermitted area) until time of discovery by Ohio EPA on March 10, 1994.

Upon discovery of the drums in the unpermitted area, Hukill immediately began relocating the aforementioned drums to the permitted storage area. Additionally, Hukill notified trucks en route to the facility to return the wastes to the generators. Hukill spent the weekend processing the drummed wastes to get inventory down such that drums could be properly stored in the permitted area.

Ohio EPA is aware that the facility had removed the drums from the unpermitted storage area by the second day of our inspection (March 14, 1994). However, Hukill failed at that time to adequately document to Ohio EPA how it would prevent future reoccurrences of this violation. Therefore, Hukill shall provide Ohio EPA with a detailed, written narrative outlining how this violation of the ORC will be prevented from occurring at this facility in the future.

Hukill Chemical Corp. has stored hazardous waste in an unpermitted area (i.e. behind the loading dock) of the facility without first obtaining a permit to store waste in that area, thus establishing a storage facility. Therefore, in order to abate this violation of the ORC, Hukill must submit to the Ohio EPA a closure plan, as specified by OAC 3745-66-10 through 15, describing steps to be taken to decontaminate the area where hazardous waste was illegally stored. The closure plan, as well as the aforementioned detailed, written narrative, must be submitted within sixty (60) days of receipt of this letter.

2. OAC Rule 3745-65-73(B)(1): Failure to provide a description and the quantity of each hazardous waste received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility as required by the appendix to this rule.

The following information which had been stencilled onto drums being stored in the unpermitted storage area, was noted during the inspection:

K-19 MF 18957
10 DRS CF 2/22/94
KRAFTMAID 950

During the inspection, Ohio EPA was given copies of the "E.P.A. Listing of Hazardous Drum Storage by Area" drum log sheets. Ohio EPA was provided with copies of drum logs for the following days: 3/1/94, 3/9/94, and 3/15/94. This drum log is part of the operating record of the facility and should exactly reflect the number of drums being stored at the facility.

Hukill failed to enter the ten (10) aforementioned Kraftmaid drums, #18957, into the "E.P.A. Listing of Hazardous Drums Storage by Area" logs dated 3/1/94 and 3/9/94. Because of this, the facility operating record did not reflect the true number of drums present at the facility on at least those two days. (The 10 Kraftmaid drums, #18957, were entered into the 3/15/94 drum inventory log).

The drum log dated 3/1/94 indicates that the hazardous waste inventory on that day was at the maximum permitted capacity of 914 drums for storage in the East Warehouse drum storage area. The log does not account for the ten (10) additional drums of hazardous waste (Kraftmaid # 18957) in storage at the facility. Had the facility been operating under permit conditions of the Part B permit and not under the Part A, Hukill would have been in violation of the conditions of the permit by storing more than the permitted number of drums in the East warehouse drum storage area.

To abate this violation, Hukill Chemical Corp. must provide:

a) A detailed, written, waste tracking system that will insure that all drums of hazardous waste accepted by the facility will be entered into the operating record, i.e., "E.P.A. Listing of Hazardous Drum Storage by Area" log.

b) The following records regarding Kraftmaid #18957: a narrative explaining why these drums were not entered into the operating record, the drum report (white card), the job cost sheet, and the Hazardous Waste Drum Processing Report for these drums.

c) All of the "E.P.A. Listing of Hazardous Drum Storage by Area" log sheets from February 14, 1994 to March 21, 1994.

3. Ohio Administrative Code (OAC) Rule 3745-65-73(B)(2): Failure to provide the correct physical location of each hazardous waste within the facility.

The operating record indicated that all drums of hazardous waste at the facility were being stored in the permitted drum storage area (i.e. the East Warehouse). However, Ohio EPA noted that drums (for example, Kraftmaid #18881, Curtis Screw #18984) said to be located in the permitted drum storage area were being stored in an unpermitted drum storage area (i.e. behind the loading dock). The violation was abated, in part, by March 14, 1994, when drums stored within the unpermitted area had been moved into the permitted storage area, or had been processed over the weekend.

The waste tracking system used by Hukill Chemical Corp. has failed to provide for the exact physical location of each waste. To return to compliance for this violation, Hukill shall include with requirement 2(a) above, a waste tracking system that accounts for the exact physical location of all drums of hazardous waste.

4. OAC Rule 3745-65-35. Aisle space.

Proper aisle space was not being maintained in the unpermitted storage area of the facility. Drums were also being stored three pallets high.

DPP

This violation was abated by March 14, 1994 when a tour of the facility demonstrated that the drums had been removed from the unpermitted area.

5. OAC Rules 3745-66-74 and 3745-65-15. Inspections and container management.

Per OAC Rule 3745-66-74, areas where drums are stored must be inspected weekly and this information recorded in a log. This information must also be contained in the operating record of the facility, as per OAC Rule 3745-65-15.

PMC 2

This violation was abated by March 14, 1994 when a tour of the facility demonstrated that the drums had been removed from the unpermitted area to the permitted storage area where the drums could be inspected weekly.

Additional Violations:

6. OAC Rule 3745-59-50(A)(2)(a). Failure to label containers with the date which accumulation began at the facility.

DLB 1

Thirty-seven drums which, in addition to being stored in the unpermitted storage area behind the loading dock, did not have the Hukill accumulation date stenciled on them. The drums contained the following information:

C-86 MF 18984
37 DRS A 16381
Tri 111 001303

The date of acceptance of the aforementioned drums was determined later in the inspection to be February 17, 1994. This information was obtained during the paperwork portion of the inspection.

To abate this violation, if the drums are still in the Drum Processing Warehouse, provide a photograph of the drums showing that the accumulation date has been placed on them. If the drums have been processed, provide the hazardous waste drum processing report to show the final disposition of the material.

7. OAC Rule 3745-59-07(A)(1). Failure to submit an LDR form with all shipments of hazardous waste off-site.

DLB

Waste shipped to Essroc Materials, Inc., December 13, 1993, manifest number 30394, did not have an accompanying LDR form with it.

To abate the violation, please provide Essroc Materials, Inc. with the missing LDR form and send a copy of the LDR to my attention.

8. OAC Rule 3745-52-20(B). Failure to include the proper waste codes on an out going shipment of hazardous waste.

GMR

The waste codes found in the 1993 Generator Annual Report and the 1993 Facility Annual Report were compared with each other. During this review it was discovered that hazardous waste with the waste code D043 was accepted by Hukill from Letterkenny Army Depot, Manifest 93275, Hukill tracking manifest #17668 (Capitol). In addition to waste code D043 the waste also contained the following codes: D001, D007, D008, D018, and D035. Waste with the code D043 was never manifested off-site by Hukill.

At the time of discovery of the error, Ohio EPA was shown the Hazardous Waste Drum Processing Report which accounts for the processing of the material. Ohio EPA was also told that the material was manifested off-site under manifest #30254 to Allworth, Inc., Mt. Pleasant, TN. This manifest did not have the D043 waste code for the waste in question nor does the description of the material manifested off-site by Hukill match the description of the material accepted by Hukill.

To abate the violation, Hukill Chemical Corp. must verify that the material shipped off-site under Manifest #30254 was the material from Letterkenny Army Depot. The manifest and LDR form must be corrected to include the waste code D043 and a copy of the correction must be sent to the accepting TSD and to my attention. Additionally, the 1993 Generator Annual Report must be corrected.

9. OAC Rules 3745-52-11(C) and 3745-59-07(A). Failure to characterize an outgoing TC waste stream.

As outlined in item #8 above, Hukill Chemical Corp. accepted on-site a waste stream containing the D043 waste code. This material was never fully characterized, per the LDR rules, with all TC waste codes when Hukill, as a generator, shipped the waste off-site. Additionally, as the generator of the waste, Hukill did not properly identify the waste, per Rule 3745-52-11(C).

GBR To abate the violation, please provide the following: the analytical information provided by Letterkenny to Hukill for proper waste characterization (pre-acceptance data), analytical results obtained by Hukill from fingerprint analysis of the incoming waste stream, and any additional information Hukill used to determine whether or not the waste stream really was a D043 waste stream.

10. OAC Rule 3745-65-31. Maintenance and Operation of Facility

Facilities shall be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-
GPF sudden release of hazardous waste or hazardous waste constituents.

The "house keeping" practices at the facility were found to be poor during this inspection. Two drums were leaking onto the floor by the dispersion mixer in the process area of the East warehouse. By the amount of stains on the floor in that area, leaking drums appear to be a common occurrence. The pump for the V-117 tank, which is used to keep the "bottoms" free flowing, was leaking into a catch "pail" which in turn appeared to have leaked/spilled onto the ground. There was enough material in the catch pail that it should have been poured into the satellite accumulation drum for that area. The metal wall in front of the East and West feeds tank showed the occurrence of past spills/leaks, as evidenced by the amount of hazardous waste that had built up on the wall. The pump and all the hoses in the area were covered with dried material which appeared to be hazardous waste.

The hazardous waste fuel tank dike contained water that needed to be pumped to one of the permitted hazardous waste storage tanks. The outside wall of this dike also indicated that past spills/leaks from transfer hoses probably occurred due to the amount of hazardous waste dried on the wall. All pumps used to transfer hazardous wastes from tank to tank were covered in waste.

To abate this violation, Hukill must fix, and provide evidence that it was fixed, the pump used to recirculate the bottoms stored in tank V-117. Additionally, Hukill shall provide information that the water that had accumulated in the fuels secondary containment dike has been pumped to a storage tank, analyzed, and properly disposed. A plan must be submitted addressing how the material that has leaked and is staining much of the concrete pad, dike walls, transfer pumps, and dispersion mixer area, will be removed. Hukill must also present a plan that outlines how spills and leaks will be cleaned up in the future to prevent hazardous waste from building up on various surfaces at the facility.

11. OAC Rule 3745-65-13(A)(3)(b) and (A)(4). Waste Analysis.

Hukill failed to repeat analysis on a waste stream labeled as non-hazardous when laboratory results indicated that the waste was hazardous (flash point less than 100 degrees F). The material was a spent printing ink, manifest #18996, received and sampled February 15, 1994.

This error in laboratory results was discovered during the inspection. Upon Ohio EPA's discovery, Hukill re-analyzed the material and determined that it was non-hazardous (flash point greater than 200 degrees F). These result were shown to Ohio EPA on March 14, 1994.

Hukill should have immediately re-analyzed this material in February once it was discovered that the waste received at the facility did not match the waste designated on the accompanying manifest.

To return to compliance for this violation, Hukill must provide documentation describing what will be done in the future if fingerprint analysis done by the facility's lab does not match the generators description.

The following items are not violations but are concerns:

1. Catch pails are placed underneath hose couplings during waste transfer to collect any leaking material. Because the catch pails are used to collect a hazardous waste, they should be labeled "Hazardous Waste". An accumulation date is not necessary since the contents of the hoppers are placed in a satellite accumulation drum. By the second day of the inspection, the hoppers had been labeled as requested by Ohio EPA.

2. Satellite accumulation areas should be listed in a log book to keep track of their location throughout the facility.

3. Two 55-gallon drums are located outside of the maintenance area. This area is considered a satellite accumulation area. One drum is for solids, the other for liquids. Neither drum was full at the time of the inspection, the total volume of the two drums being less than 55-gallons. Please be advised that the combined total volume at a satellite accumulation area is 55-gallons. It is not 55-gallons per waste stream. Hukill will want to change the drums used at this satellite area from 55-gallon drums to (two) 25-gallon drums so as not to go over the 55-gallon limit.

4. The facility contingency plan and inspection checklists need to be updated to reflect current conditions at the facility. One of the items being checked is "water table" which hasn't been an issue since the tributary to Tinker's Creek was enclosed. Two copies of the updated material should be submitted to my attention with a cover letter explaining that they are updated changes to the Part B permit. A third copy should be sent to Ed Lim in Columbus.

Please respond to the violations listed within 30 days of receipt of this letter, except for violation #1 which you have 60 days to respond to. Due to the nature and seriousness of the listed violations, Hukill Chemical Corp. may be referred to the Division of Hazardous Waste Management's Enforcement Screening Committee for their consideration in an upcoming Enforcement Screening Committee meeting. Failure to list specific deficiencies that may have been overlooked in this communication does not release Hukill from compliance with all applicable hazardous waste regulations. Please be advised that past or future instances of non-compliance can continue as subjects of pending or future enforcement actions.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (i.e. source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment and improve your public image by implementing pollution prevention programs. For more information about pollution prevention including fact sheets or the U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92/088), please contact the Ohio EPA's Pollution Prevention Section at (614) 644-3469.

Should you have any questions, please do not hesitate to call me at (216) 963-1162.

Sincerely,

Marlene M. Emanuelson

Marlene M. Emanuelson
Environmental Scientist
Division of Hazardous Waste
Management

cc: Frank Popotnik, DHWM, NEDO
Laurie Stevenson, DHWM, CO
Gertrude Matuschkovitz, U.S. EPA
Gordon Garcia, U.S. EPA